StaBillon
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European currencies denominated E-Money Tokens
named the Stabillon European EMT

www.stabillon.com

White Paper: Stabillon European EMTs

Articles 51 to 53 of MiCA regulation compliant with the requirements of Commission Implementing Regulation (EU) 2024/2984 of 29 November 2024 laying down implementing technical standards for the purposes of applying Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to forms, formats and templates for information documents on crypto-assets.

This Information Document on crypto-assets has not been approved by any competent authority in any Member State of the European Union. The issuer of this Information Document on crypto-assets bears sole responsibility for the content of this Information Document on crypto-assets.

Information on the notification of the Information Document and the entity authorized to issue Electronic Money Tokens is available in the register of the European Securities and Markets Authority at:

https://www.esma.europa.eu/esmas-activities/digital-finance-and-innovation/markets-crypto-assets-regulation-mica

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In this information document, every word or expression beginning with a capital letter (e.g., "Issuer", "Token", "Market Participant") has the meaning assigned to it in the "Definitions" chapter or in another place where it has been explicitly defined. Every time such a marked word appears again in the text, it should be read exactly in the same, established meaning - regardless of singular or plural number, gender, or grammatical form.

Electronic Money Token (EMT)	A type of crypto-asset that aims to maintain stable value by being linked to one official currency
MiCA	Regulation of the European Parliament and of the Council (EU) 2023/1114 establishing regulatory frameworks for the issuance and trading of crypto-assets, including e-money tokens, in the European Union
Distributed Ledger Technology (DLT)	Technology enabling the operation and use of distributed ledgers in supported blockchain protocols
Billon Unified Blockchain	Proprietary distributed ledger technology developed by Billon Group Ltd., characterized by high performance and high energy efficiency
Blockchain, Distributed Ledger Technology or DLT	Technology enabling the operation and use of distributed ledgers; Decentralized technology enabling storage and verification of transactions across multiple network nodes simultaneously, eliminating the need for central administration and increasing data security
Smart Contract	Self-executing computer code operating on a blockchain platform, automatically executing contract conditions, used for creating, redeeming, and managing Stabillon European EMT tokens. Currently supported is the standard of blockchains compatible with Ethereum EVM
Digital Wallet	Software or device enabling storage, sending, and receiving of digital tokens, containing cryptographic keys necessary for transaction authorization

Redemption Plan	A mandatory regulatory document that every e-money token (EMT) issuer must prepare, in accordance with Article 46 of MiCA Regulation (EU) 2023/1114. This plan specifies detailed procedures enabling token holders to recover the equivalent value of tokens in official currency (e.g., EUR, PLN), in case of: cessation of operations by the issuer, serious financial difficulties of the issuer, or withdrawal of regulatory authorization
Recovery Plan	Document required in accordance with Article 46 of Regulation (EU) 2023/1114 (MiCA), specifying measures taken by the asset-referenced token issuer in case of violation of asset reserve requirements or threat to business continuity. The plan contains procedures for restoring regulatory compliance, ensuring service continuity, and possible corrective actions, such as redemption fees, daily redemption limits, or its temporary suspension
DLT Network Node or Node	A device or process that is part of the network and has a complete or partial replica of records of all transactions in the distributed ledger
HSM (Hardware Security Module)	Cryptographic device ensuring secure generation, storage, and management of cryptographic keys used for transaction authorization and token creation operations
Minting (creation operation)	Process of issuing new Stabillon European EMT tokens after receiving equivalent value in official currency (e.g., EUR or PLN), aimed at ensuring full token coverage in a 1:1 ratio through reserves
Multi-entity Emission Architecture (Multi-minting)	Functionality enabling the issuance of Stabillon European EMT tokens by multiple authorized issuers in different jurisdictions, while maintaining uniform token structure and full security
Burning (burning operation)	Process of permanently withdrawing Stabillon European EMT tokens from circulation as a result of their redemption by the issuer, serving to maintain the 1:1 relationship between the number of tokens in circulation and the value of securing reserves

Consensus Mechanism	Rules and procedures based on which approval of transactions is agreed between DLT network nodes
Proof of Stake (PoS)	Consensus mechanism in which the right to create new blocks and confirm transactions is granted to participants proportionally to the number of tokens they possess
Proof of Authority (PoA)	Consensus mechanism in which transactions are approved by previously identified and approved nodes with known identity
ERC-20	Technical standard used on the Ethereum platform for implementing fungible tokens, defining a set of rules and functions that a token must meet to be compatible with the Ethereum ecosystem
Corporate Account	Billon middleware software system that serves as a bridge between traditional financial systems and blockchain infrastructure, providing a secure interface for institutional users
Fee Batch Identifier	Unique identifier assigned to a group of Stabillon European EMT tokens, used for tracking and allocating rewards in the incentive program for users and liquidity providers
Validator	Blockchain network participant responsible for verifying transactions and creating new blocks according to network consensus rules. In Billon Unified Blockchain, validators are trusted nodes selected according to specific criteria
IPFS (InterPlanetary File System)	Protocol and peer-to-peer network for storing and sharing data in Electronic Money Token (EMT)A type of crypto-asset that aims to maintain stable value by being linked to one official currencyMiCARegulation of the European Parliament and of the Council (EU) 2023/1114 establishing regulatory frameworks for the issuance and trading of crypto-assets, including e-money tokens, in the European UnionDistributed Ledger Technology (DLT)Technology enabling the operation and use of distributed ledgers in supported blockchain protocolsBillon Unified BlockchainProprietary distributed ledger technology developed by Billon Group Ltd., characterized by high performance and high energy efficiencyBlockchain, Distributed Ledger Technology or DLTTechnology enabling the operation and use of

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"Changechain" Function	Functionality enabling Stabillon European EMT tokens to move between Billon Unified Blockchain and other blockchain platforms, increasing system flexibility and availability
Decentralized Key Management	Cryptographic key management system in which responsibility for storing and using keys is distributed among multiple nodes, eliminating single points of failure and increasing overall system security
Segregated Accounts	Bank account used to store user funds separately from the service provider's own funds. The purpose of maintaining a segregated account is to protect user funds in case of insolvency or financial difficulties of the service provider
Liquidity Reserves (Stabillon European EMT Reserves)	Monetary funds received by the issuer in exchange for issued e-money tokens, stored and managed in accordance with Article 54 of MiCA and Article 7(1) of Directive 2009/110/EC. At least 30% of these funds are deposited in segregated accounts at credit institutions. The remaining part of the funds is invested in safe, highly liquid financial instruments with low market, credit, and concentration risk, denominated in the same currency as the reference currency of EMT tokens. These reserves constitute full security for Stabillon European EMT tokens in a 1:1 ratio and are the basis for the right to redeem tokens by their holders
Reserve Attestations	Cryptographically verifiable certificates confirming that all Stabillon European EMT tokens in circulation are fully secured by reserves in official currency or safe assets, published regularly for transparency purposes
Airdrop	Free distribution of digital tokens to specific users, usually to promote a project, reward loyal users, or increase ecosystem adoption. Airdrop can be: • **conditional** - dependent on performing specific actions (e.g., registration, wallet use, platform activity), • or **unconditional** - consisting of automatic token allocation to specific addresses

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I.01	Date of notification	4th of September 2025
I.02	Statement in accordance with Article 51(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 issuer of the crypto-asset is solely responsible for the content of this crypto-asset White Paper.
I.03	Compliance statement in accordance with Article 51(5) of Regulation (EU) 2023/1114	This White Paper complies with Title IV of Regulation (EU) 2023/1114 and to the best of the knowledge of the management body, the information presented in the White Paper is fair, clear, and not misleading and the White Paper makes no omission likely to affect its import.
I.04	Warning in accordance with Article 51(4), points	This e-money token is not covered by the investor compensation schemes under Directive 97/9/EC. This e-money token is not covered by the deposit guarantee schemes under Directive 2014/49/EU.

	(a) and (b) of Regulation (EU) 2023/1114	

SUMMARY		
I.05	Warning in accordance with Article 51(6), second subparagraph of Regulation (EU) 2023/1114	**Warning** This summary should be read as an introduction to the White Paper. The prospective holder should base any decision to purchase European EMTs on the content of the White Paper as a whole and not on this summary alone. The offer to the public of Stabillon European EMTs 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 applicable national laws. This 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 EU or national law.
I.06	Characteristics of crypto-asset	**Stabillon European EMTs** are electronic money tokens whose value is permanently pegged to a specific official currency. Electronic money tokens are issued to enable payment transactions to be executed faster and more securely than with existing solutions. Additionally, since electronic money token transactions are Peer-to-Peer (P2P) in nature, completing transactions between parties does not require the involvement of an intermediary entity, as is the case with bank payments or traditional payment transactions. This enables fast and secure payments using tokens that maintain stable value. The ability to make payments using Stabillon European EMTs may depend on the acceptance of this form of payment by the potential recipient. Stabillon European EMTs provide the ability to execute payment transactions and can be used as a means of storing value. For each issued Stabillon European EMT, Stabillon holds a corresponding unit of official currency, ensuring 1:1 backing at all times. Stabillon European EMTs meet all electronic money token requirements specified in Regulation 2023/1114 on markets in crypto-assets and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937.

		Stabillon European EMTs are issued on Billon blockchain technology, which enables their transfer to other protocols including Ethereum and Solana. **General advantages of blockchain stablecoins:** Stablecoins like Stabillon are digital forms of national currencies recorded in new distributed ledger technology, whose value is stable and rigidly pegged to traditional money (e.g., euro or PLN), protecting against price fluctuations typical of cryptocurrencies. Thanks to blockchain technology, they offer several key advantages over classical payment systems: **Speed:** Transactions occur 24/7, without weekend or holiday breaks, and are settled in seconds rather than business days. It's like sending an email instead of a postal letter - global and instantaneous. **Security:** Blockchain acts as an immutable transaction ledger, protected by cryptography. Each operation is verified by a network of computers, minimizing the risk of fraud, human errors, or hacker attacks. MiCA stablecoins are 100% backed by reserves (e.g., cash in banks and safe securities), guaranteeing they can always be exchanged for traditional money. The accumulated reserves are held in special segregated custodial accounts and are excluded from enforcement proceedings - meaning they are fully protected against potential insolvency of the Issuer or potential insolvency of the custodian bank holding the reserves - this protection covers 100% of the accumulated funds. Other benefits include lower costs (no intermediaries), greater financial inclusion (access for people without bank accounts), and transparency - anyone can verify transaction history. These features make stablecoins faster and more secure than traditional methods, where transactions depend on bank business hours and settlement sessions, and maintaining ownership records requires trust in third parties, while security relies on central systems susceptible to failures. **Why faster (in practice for users previously using traditional banking systems):** • 24/7 settlement and near-instantaneity: transfers arrive in block time (seconds), without settlement hours or days off • Fewer intermediaries: no multi-stage interbank settlements reduces time and operational risk • Predictability and automation: fee and settlement rules are transparent and pre-coded; no discretionary delays

		• Better UX (optionally): support for "permit" signatures and meta-transactions enables simpler, one-click actions on the user's wallet side. ERC-20 standard support enables users freedom and flexibility in wallet choice and control over their funds **How we guarantee security (on-chain enforced mechanisms):** • 100% reserves and constant 1:1 exchangeability, without exchange rate risk • Double-entry bookkeeping and reserve verification: Each transaction is checked for compliance with reserves (e.g., euro in the bank). We use a double-entry bookkeeping system - like in traditional accounting - preventing errors and fraud. Reserves are verified daily through independent attestations (in accordance with MiCA Art. 49), with results publicly available. This means you always have a guarantee that real cash backs every token • Issuance of new tokens is only allowed when current confirmation (attestation) exists for given reserve accounts - enforced daily by the contract. If attestation is older than 24h, issuance automatically blocks • After each redemption, the system verifies that circulating supply is still fully backed by reserves • Separate reserve pools for different jurisdictions and banking entities (maintaining custodial accounts) minimize fund mixing and facilitate oversight • Each transfer, issuance, and redemption goes through two independent double-entry bookkeeping records (standard ERC-20 balance and internal batch balances) • The contract compares values after operations; any discrepancy causes immediate transaction halt (revert), preventing any inconsistencies • Redemptions (fiat payouts for tokens) are a fundamental right; the system doesn't allow global suspension. Users can always redeem their tokens in accordance with MiCA • If needed, specific Smart Contract technical sub-functions can be temporarily blocked (e.g., for updates) without stopping the entire system, and user funds remain accessible **Role separation and principle of least privilege:** • MASTER_MINTER (administrative role) configures the system but doesn't execute operations • MINTER (operational role) operates only within assigned pools (accounts)

		• Additionally, per-pool mandatory reserve roles (e.g., POOL_MINTER) restrict access to specific reserve accounts. This minimizes error and abuse risk • Software updates are controlled through GOVERNANCE Role and multi-signature with time delay, preventing unauthorized changes **Compliance and abuse prevention:** • Built-in checks and on-chain compliance functions (e.g., empty addresses, blacklists, "freeze periods" due to compliance actions) operate before transfer logic, limiting risk and costs • Protection against accidental transfer to "empty" address can be enabled by the user • Transparency and auditability of all critical function with public on-chain history record • State history and balance snapshots enable simple retroactive control • Fee rules are transparent, with thresholds recorded on-chain Stabillon may issue electronic money tokens whose value is pegged to the following official currencies: • Polish Złoty • Bulgarian Lev • Czech Koruna • Danish Krone • Hungarian Forint • Romanian Leu • Swedish Krona • Euro
I.07	Right of redemption	Holders of this token have the right to demand redemption at any time and at nominal value. This means that the holder of Stabillon European EMTs will receive the value of official currency corresponding to a 1:1 value of the tokens being redeemed (e.g., for 1 Stabillon European EMT representing Polish Złoty, the holder will receive 1 Polish Złoty). Redemption by Stabillon is carried out without undue delay; however, the necessity of conducting additional verifications resulting from anti-money laundering regulations may extend this period to 5 business days. Redemption of Stabillon European EMT tokens is free of charge. Exercise of the redemption right is associated with the necessity of performing anti-money laundering activities.

		Holders of Stabillon European EMTs who do not have an open account with Stabillon are required to open one before making a redemption. Detailed conditions for token redemption have been specified in the Stabillon European EMTs Redemption Policy, which is published on stabillon.com.
I.08	Key information about the offer and/ or admission to trading	Stabillon European EMTs are available in selected jurisdictions, and access to them is possible through institutions that have entered into agreements with Stabillon. • **Jurisdictions:** Poland, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Spain, Netherlands, Ireland, Lithuania, Luxembourg, Latvia, Malta, Germany, Portugal, Romania, Slovakia, Slovenia, Sweden, Hungary As EMT adoption develops, Stabillon will be available in additional jurisdictions and the network of institutions is constantly being expanded. Current information is available on the Issuer's website. Stabillon does not provide for: • limiting the amount of Stabillon European EMTs that can be issued, which will depend solely on market demand • limiting the maximum amount of Stabillon European EMTs held by a holder Before purchasing Stabillon European EMT tokens, we suggest verifying: • whether the tokens meet the purpose for which they are being purchased • whether they are being purchased from an intermediary institution

PART A - INFORMATION ON THE ISSUER OF THE E-MONEY TOKEN		
A.1	Statutory Name	StaBillon spółka z ograniczoną odpowiedzialnością
A.2	Trading Name	Stabillon

<table>
<tr><td>A.3</td><td>Legal form</td><td>Limited liability company - Spółka z ograniczoną odpowiedzialnością</td></tr>
<tr><td>A.4</td><td>Registered address</td><td>Atlas Tower piętro 17, Al. Jerozolimskie 123A, 123A, Warszawa 02-017, Polska</td></tr>
<tr><td>A.5</td><td>Head office</td><td>Atlas Tower piętro 17, Al. Jerozolimskie 123A, 123A, Warszawa 02-017, Polska</td></tr>
<tr><td>A.6</td><td>Registration Date</td><td>2017-06-14</td></tr>
<tr><td>A.7</td><td>Legal entity identifier</td><td>2594008EL5UN8RIA8P23</td></tr>
<tr><td>A.8</td><td>Other identifier required pursuant to applicable law</td><td>KRS 0000682897</td></tr>
<tr><td>A.9</td><td>Contact telephone number</td><td>+48 570 555 702</td></tr>
<tr><td>A.10</td><td>E-mail address</td><td>contact@stabillon.com</td></tr>
<tr><td>A.11</td><td>Response Time (Days)</td><td>7 days</td></tr>
<tr><td>A.12</td><td>Parent Company</td><td>Billon Spółka z ograniczoną odpowiedzialnością, Atlas Tower floor 17, Al. Jerozolimskie 123A, 123A, Warszawa 02-017, Polska.</td></tr>
<tr><td>A.13</td><td>Members of management body</td><td>
<table>
<tr><th>Name</th><th>Business address</th><th>Function</th></tr>
<tr><td>Andrzej Horoszczak</td><td>Atlas Tower Floor 17, Al. Jerozolimskie 123A, 123A, Warsaw 02-017, Poland</td><td>President of the Management Board</td></tr>
<tr><td>Robert Kałuża</td><td>Atlas Tower Floor 17, Al. Jerozolimskie 123A, 123A, Warsaw 02-017, Poland</td><td>Board Member</td></tr>
</table>
</td></tr>
<tr><td>A.14</td><td>Business Activity</td><td>Stabillon is an Electronic Money Institution (KIPE1/2019) authorized by the Polish Financial Supervision Authority.

The company operates the mass and programmable payments system based on its (a) e-money license, (b) operational processes, and (c) Billon Unified Blockchain technology framework as well as other distributed blockchain protocols.</td></tr>
</table>

A.15	Parent Company Business Activity	Billon Group Ltd specializes in high-performance blockchain solutions for secure digital document exchange, asset tokenization, data handling, and digital cash transactions. Their technology ensures compliance and security through user-controlled digital Sovereign Identities - developed as part of Billon's participation in EBSI (EU Commission's European Blockchain Service Infrastructure project) Billon Group Ltd serves diverse sectors e.g.: • Financial Sector: Secure, branded document management for Polish financial institutions through collaboration with the Polish Credit Information Bureau (BIK). • Education: Blockchain-based digital diplomas and certificates for Polish universities via the OPTeam partnership. • Energy Sector: Document management solutions for Tauron, Poland's largest energy utility. • Waste Management: Secure document management for EDZ. More information about Billon Group Ltd's activities is available at https://billongroup.com/.
A.16	Conflicts of Interest Disclosure	Not identified
A.17	Issuance of other crypto-assets	Stabillon plans to issue electronic money tokens whose value will be pegged to the US Dollar.
A.18	Activities related to other crypto-assets	No
A.19	Connection between the issuer and entity running the DLT	Yes
A.20	Description of connection between the issuer and the entity running the DLT	The issuance of Stabillon European EMTs will take place on Billon Unified DLT, which is owned by Billon Group Ltd., and Stabillon has entered into agreements with Billon Group ensuring the required licensing, technical support and technological development, as well as on Ethereum, which is a public EVM-type blockchain. The additional support for additional blockchains and an update to the information document are planned.

		The networks are public and therefore are not controlled by any person closely associated with the project participants, both in relation to Billon Unified DLT and Ethereum.
A.21	Newly Established	No
A.22	Financial condition for the past three years	Following the license award in 2019, Stabillon commenced providing its first services to initial customers in March 2021, notifying the regulatory authority accordingly. **Share Capital Growth** Stabillon has been executing activities to increase its share capital - from 1.7 million PLN in 2021 to 6.236 million PLN in February 2025. This represents over a threefold increase in share capital over four years, demonstrating strong investor confidence and consistent execution of development plans. By the end of 2025, Stabillon plans to increase its equity capital to at least 13 million PLN. **Solid Regulatory and Capital Foundations** Throughout its entire operating period, Stabillon has consistently met all capital requirements mandated by the Electronic Money Institution supervision, maintaining positive liquidity indicators. The data shows not only stability but significant strengthening of capital position: • Available capital to required capital ratio: growth from 113.1% in 2023, through 109.9% in 2024, to an impressive 251.9% in 2025 - exceeding regulatory requirements by more than two and a half times • Liquidity ratio: stable at 1.13 in 2023, significant increase to 9.84 in 2024, maintaining a solid level of 4.67 in 2025 **Strategic Transformation with Secured Financing** The year 2024, with a margin of -187%, was associated with expenses incurred for preparing operations to comply with MiCA regulations, which enabled the launch of a new business line in electronic money token (EMT) issuance. 2024 represented a preparatory period for implementing the new Stabillon European EMT product, compliant with MiCA regulation provisions. As Stabillon's activities in 2024 focused mainly on limiting previous operations, ownership changes, and preparatory work for electronic money token issuance. In 2025, the company plans to increase capital by approximately 9 million PLN, sourced from new investors and minority shareholders. **Company Revenues**

In recent years, Stabillon operated in a business model based on Electronic Money services. Sales revenues and financial results in individual years were as follows:

- 2024: 185,508 PLN (Loss: -1,085,757 PLN)
- 2023: 505,642 PLN (Loss: -837,675 PLN)
- 2022: 464,714 PLN (Loss: -1,408,092 PLN)

The 63.3% revenue decline in 2024 was a conscious consequence of the strategic decision to restructure operations and prepare for launching the innovative Token Issuance (EMT) model and changing the business model to Stablecoin Issuer.

The company has no material liabilities or interest costs, so cash flows consist of financial results and capital flows from shareholders.

Capital flows with stable support from strategic investor Billon sp. z o.o. and from 2024 minority shareholders: Systematic share capital growth: 1.7 million PLN (2021) → 4.4 million PLN (2022) → 4.9 million PLN (2023) → 5.635 million PLN (2024) → 6.236 million PLN (February 2025).

Full financial statements with auditor's opinion are available in the National Court Register.

Forecasts for 2025-2026:

- 2025E (first year of full EMT operability):
  - Gross margin: 10.8%
  - EBITDA margin: -25.4%
- 2026E (full EMT model monetization):
  - Gross margin: 23.6%
  - EBITDA margin: 3.7%

Results from the 2022-2024 period reflect a long-term strategy of building market position and intensive investment in business transformation, while maintaining full regulatory stability.

Key Non-Financial Performance Indicators

Regulatory indicators (confirming compliance with supervisory requirements):

Indicator	2023	2024	2025E
Available to required capital ratio	113.1%	109.9%	251.9%

		<table><tr><td>Liquidity ratio (not applicable to e-money in circulation)</td><td>1.13</td><td>9.84</td><td>4.67</td></tr><tr><td>Current liquidity ratio</td><td>0.98</td><td>7.60</td><td>-</td></tr><tr><td>Total debt ratio</td><td>42.2%</td><td>16.7%</td><td>-</td></tr></table> **Transformation efficiency:** • Effective reduction of operating costs by 31.6% in the 2022-2024 period • Cost structure optimization (31.9% reduction in salaries in 2024) • Significant improvement in liquidity and debt indicators **2026 Outlook with Strong Capital Support** Stabillon's potential related to Stabillon European EMT issuance will be revealed in 2026, when operational activities in electronic money token issuance will be conducted, whereby we predict that with support from additional capital from external investors, Stabillon will achieve: • Gross margin of +23.6% • EBITDA margin of +3.7% The capital coverage ratio of 251.9% in 2025 means the company has over two and a half times more capital than required by the regulator.
A.23	Financial condition since registration	Not applicable. Stabillon has been operating for a period longer than 3 years.
A.24	Exemption from authorisation	No
A.25	E-money Token Authorisation	Stabillon is an Electronic Money Institution, authorised under KIPE1/2019 authorisation by the Polish Financial Conduct Authority (KNF) on 23 April 2019.
A.26	Authorisation Authority	Polish Financial Supervision Authority = Komisja Nadzoru Finansowego (KNF) - https://www.knf.gov.pl/

A.27	Persons other than issuer offering to the public or seeking admission to trading of e-money token according to Article 51(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable
A.28	Reason for offering to the public or seeking admission to trading of the e-money token by persons referred to in Article 51(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable

<table>
<tr><td colspan="3">PART B - INFORMATION REGARDING THE E-MONEY TOKEN</td></tr>
<tr><td>B.1</td><td>Name</td><td>PLN-DT, BGN-DT, CZK-DT, DKK-DT, HUF-DT, RON-DT, SEK-DT, EURO-DT</td></tr>
<tr><td>B.2</td><td>Abbreviation</td><td>PLNDT, BGNDT, CZKDT, DKKDT, HUFDT, RONDT, SEKDT, EURODT</td></tr>
<tr><td>B.3</td><td>Details of all natural or legal persons involved in design and development</td><td>
<table>
<tr><td>Area</td><td>Name</td><td>Business Address</td></tr>
<tr><td>Legal</td><td>Adwokat Jan Ziomek Kancelaria Adwokacka,</td><td>ul. Targowa 56, 05-816 Michałowice</td></tr>
<tr><td>Tech</td><td>Billon sp z o.o.</td><td>Atlas Tower Floor 17, Al. Jerozolimskie 123A, 123A, Warsaw 02-017, Poland</td></tr>
</table>
</td></tr>
</table>

		<table><tr><td>Support</td><td>Billon Digital Services sp z o.o.</td><td>Atlas Tower Floor 17, Al. Jerozolimskie 123A, 123A, Warsaw 02-017, Poland</td></tr><tr><td>CASPs</td><td>Not applicable</td><td>Not applicable</td></tr></table>
A DESCRIPTION OF THE CHARACTERISTICS OF THE E-MONEY TOKEN, INCLUDING THE DATA NECESSARY FOR CLASSIFICATION OF THE CRYPTO-ASSET WHITE PAPER IN THE REGISTER REFERRED TO IN ARTICLE 109, AS SPECIFIED IN ACCORDANCE WITH PARAGRAPH 8 OF THAT ARTICLE		
B.4	Type of white paper	EMTW
B.5	Type of submission	NEWT
B.6	Crypto-Asset Characteristics	Stabillon European EMTs is an electronic money token within the meaning of Article 3, paragraph 1, point 7 of the MiCA regulation. Stabillon European EMTs is an electronic money token pegged to official currency (e.g., Polish Złoty) and is issued by Stabillon. Stabillon European EMTs are electronic money tokens whose value is permanently pegged to a specific official currency. Electronic money tokens are issued to enable payment transactions to be executed faster and more securely than with existing solutions. Official currencies collected by Stabillon for which it issued Stabillon European EMTs are secured in segregated bank accounts or in safe liquid financial instruments, i.e., in accordance with Article 54 of the MiCA regulation. The ability to make payments using Stabillon European EMTs may depend on the acceptance of this form of payment by the potential recipient. Stabillon European EMTs provide the ability to execute payment transactions and can be used as a store of value. For each issued Stabillon European EMT, Stabillon stores the corresponding unit of official currency, ensuring 1:1 coverage at all times. Stabillon European EMTs meet all requirements for electronic money tokens specified in Regulation 2023/1114 on markets in crypto-assets and amending regulations (EU) No 1093/2010 and (EU) No 1095/2010 and directives 2013/36/EU and (EU) 2019/1937. The full collateralization model ensures that for every Stabillon European EMT issued by Stabillon and remaining in circulation, Stabillon holds on behalf of holders either one unit of the corresponding fiat currency or an equivalent amount of fiat-denominated assets in its Segregated Accounts

		(the "Stabillon European EMT Reserves"). These reserves are safeguarded through a robust protection framework that includes strict segregation from corporate assets, placement only in low-risk, highly liquid instruments (approved by eMoney regulations in Poland). The safeguarding arrangements ensure that Stabillon European EMT holders' funds are protected from the risk of insolvency and remain readily available for redemption at all times. Stabillon European EMTs are issued multi-chain, including on the Billon Unified blockchain, which enables their transfer to other distributed network protocols, including Ethereum. Stabillon may issue electronic money tokens whose value is pegged to the following official currencies: • Polish Złoty • Bulgarian Lev • Czech Crown • Danish Crown • Hungarian Forint • Romanian Leu • Swedish Crown • Euro
B.7	Issuer Website	https://stabillon.com/
B.8	Starting date of offer to public or admission to trading	2025-10-30 - Limited market pilot (quantity and value restrictions), full-scale operations to commence after analyzing Pilot results, estimated timeline: 4-8 weeks
B.9	Publication date	2025-10-02
B.10	Other services provided by the issuer	Stabillon provides services as an Electronic Money Institution, based on license KIPE1/2019 issued by the Polish Financial Supervision Authority (KNF) on April 23, 2019. Stabillon may provide the following services: • Maintaining payment accounts • Accepting deposits to payment accounts and making withdrawals from payment accounts and all operations necessary for maintaining such accounts

		• Execution of payment transactions, including transfer of funds to a payment account with the user's provider or another provider using a payment card or similar payment instrument • Execution of payment transactions, including transfer of funds to a payment account with the user's provider or another provider by executing a transfer order, including standing orders • Issuing payment instruments • Issuing Electronic Money that is not an EMT Token • Accepting electronic payments for the purpose of paying for issued Electronic Money Stabillon's activities are conducted based on the following regulations: • Act of August 19, 2011 on Payment Services (consolidated text, Journal of Laws of 2025, item 611, as amended) • Directive (EU) 2015/2366 of the European Parliament and of the Council of November 25, 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC, 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC • Directive 2009/110/EC of the European Parliament and of the Council of September 16, 2009 on the taking up, pursuit and prudential supervision of the business of electronic money institutions amending Directives 2005/60/EC and 2006/48/EC and repealing Directive 2000/46/EC • Regulation 2023/1114 of the European Union on markets in crypto-assets in the EU, known as MiCA (Markets in Crypto-Assets Regulation)
B.11	Language or languages of the white paper	Polish (prevailing) and English (for informational purposes only)
B.12	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	PLN-DT, BGN-DT, CZK-DT, DKK-DT, HUF-DT, RON-DT, SEK-DT, EURO-DT

B.13	Functionally Fungible Group Digital Token Identifier, where available	Not available
B.14	Personal data flag	Yes
B.15	LEI eligibility	eligible
B.16	Home Member State	Republic of Poland
B.17	Host Member States	Not applicable

PART C – OFFERING TO THE PUBLIC OR ADMISSION TO TRADING OF E-MONEY TOKEN		
C.1	Public Offering or Trading	OTPC - (Public offering) and ATTR (Admission to trading)
C.2	Number of units	Stabillon does not anticipate: • limiting the quantity of Stabillon European EMTs that can be issued, and this will depend solely on market demand • limiting the maximum quantity of Stabillon European EMTs held by a holder In each case, the quantity of issued Stabillon European EMTs tokens will depend on market demand.
C.3	Trading Platforms	Stabillon is conducting discussions about introducing Stabillon European EMTs on recognized trading platforms such as OKX, Bitstamp and Bit Panda, MoonPay, BitStamp, Hidden Road, Boerse Stuttgart Digital Exchange. Continuation of listing on the indicated trading platforms will depend on these entities ensuring compliance with universally applicable regulations, including the MiCA regulation, and obtaining authorization to conduct business as a CASP.

		The list of trading platforms that enable trading of Stabillon European EMTs is available on the Stabillon.com website. Since Stabillon European EMTs will be processed on publicly available blockchain platforms such as Ethereum or Solana, adding a new Stabillon European EMTs token will be technically the same as listing by a given partner of any other token compliant with ERC-20 standards (for Ethereum) or SPL (for Solana). The integration process will only require adding appropriate smart contracts to the trading platform's system, without the need to create custom technical solutions. Using existing, proven blockchain standards ensures both transaction security and significantly accelerates the implementation process on subsequent platforms.
C.4	Trading Platforms Market Identifier Code (MIC)	Not applicable
C.5	Applicable law	Disputes arising from or related to the public offering of Stabillon European EMTs will be resolved before the court having jurisdiction based on Stabillon's registered seat, except in situations where generally applicable laws specify different court jurisdiction.
C.6	Competent court	Any disputes arising from or in connection with the Stabillon European EMTs public offering shall be settled before the court having jurisdiction over Stabillon's registered office, except where generally applicable provisions specify a different court's jurisdiction.

PART D - RIGHTS AND OBLIGATIONS ATTACHED TO E-MONEY TOKENS		
D.1	Holder's rights and Obligations	**1. Right to Redemption** Holders of Stabillon European EMT have the right at any time to request redemption of tokens at their par value, i.e., 1 EMT = 1 EUR. For this purpose, a redemption request must be submitted through the dedicated communication channel (e.g., online form or email). Conditions for redemption execution: • Positive identity verification and compliance with anti-money laundering regulations (KYC/AML),

		• Transfer of EMT to an address designated by the issuer, owned by the issuer, whose keys allow for the execution of the special Burn function in accordance with the ERC-20 standard (i.e., irreversible sending of the fund balance to the special address 0x0). The issuer shall execute the redemption no later than within five (5) business days from a properly submitted request. In the case of redemption of significant amounts, the redemption period may be extended due to the need to release reserves backing the issued e-money tokens. Redemption of tokens directly from the issuer is free of charge - Stabillon does not charge any commissions or handling fees. **2. Issuance and Backing** EMT tokens are issued exclusively after prior receipt of funds in the given currency at a 1:1 ratio. This means that each token in circulation is fully backed by currency reserves held in segregated accounts at credit institutions. EMT holders do not acquire rights to interest, capital gains, or any benefits based on the duration of token holding. Reserves may be held in interest-bearing accounts; however, any profits thereof accrue exclusively to the issuer. **3. Transactions and Transfer of Rights** Transfer of EMT to another blockchain address automatically results in the transfer of redemption rights to the new holder. Such transaction is irreversible - in case of incorrectly entered address or loss of access to the wallet, tokens may be lost without possibility of recovery. The issuer has no obligation and technical capability to reverse a transaction made by the user. **4. Compliance Rules and Restrictions** EMT holders are obligated to: • Provide true, complete, and current identification data and promptly update them in case of any changes, • Ensure compliance of EMT use with applicable law, including regulations concerning anti-money laundering (AML) and counter-terrorist financing (CTF), • Comply with all territorial, sanctions, and regulatory restrictions, • Not use EMT for illegal activities, particularly such as money laundering, fraud, illegal gambling, trading in prohibited goods, or financing criminal activity,

- Use EMT exclusively for their own account - without acting on behalf of third parties, unless otherwise expressly agreed with the issuer,
- Exercise care in securing access to the digital wallet, particularly storing private keys in a secure manner,
- Not attempt to circumvent KYC/AML procedures or operational restrictions imposed by the issuer,
- Not send EMT to blocked addresses or those indicated by the issuer as unsupported.

The issuer reserves the right to:

- Refuse redemption execution,
- Temporarily suspend transactions,
- Block specific addresses,

if it determines that the holder's actions are non-compliant with legal provisions, internal procedures, or may violate public interest, AML regulations, sanctions provisions, or security principles.

5. Fees and Costs

The issuer does not charge fees for issuance or redemption of EMT. Tokens are issued at parity (1 EUR = 1 EUR EMT), and redemption occurs at the same par value.

Stabillon European EMTs has a reward system aimed at selected users - particularly large institutional buyers and entities supporting token liquidity. Clients directly purchasing EMT from Stabillon may negotiate with the issuer:

- Individual fee structures,
- Premiums resulting from high transaction volume,
- Participation in transaction fees as a form of incentive for engagement in providing liquidity.

Such arrangements are individual in nature, are negotiated bilaterally, and do not constitute part of the standard EMT offering available to all holders.

When using services of external intermediaries (e.g., exchanges, trading platforms), independent transaction fees may apply, which are not determined or collected by Stabillon. Users should familiarize themselves with the terms of service provision by such entities.

6. Access to Information

		EMT holders have the right to transparent and timely information concerning: • Reserves backing EMT, • Total token supply, • Terms of issuance and redemption, • Changes in the structure or operating principles of EMT. The issuer provides access to information documents, reserve reports, and current terms of service through its website. **7. Scope of Liability** Holding EMT is not associated with acquiring any shareholding rights in Stabillon. Tokens do not grant voting rights, profit participation, or access to the issuer's assets. The issuer's liability is limited to obligations provided by MiCA regulations, including particularly: • Ensuring redemption of EMT, • Maintaining backing reserves, • Compliance with information and transparency principles. The issuer is not liable for consequences of user actions, such as: • Loss of access to private keys, • Erroneous transactions, • Use of tokens in a manner inconsistent with the terms or law. **8. Termination of Relationship** Holders have the right to terminate the relationship with the issuer at any time by redeeming all held EMT and closing the account. After termination of the relationship, personal data is stored only to the extent required by law, particularly to fulfill reporting and supervisory obligations.
D.2	Conditions of modifications of rights and obligations	The rights and obligations of Stabillon European EMTs holders may be modified under the following conditions: • To ensure compliance with applicable laws and regulations within Stabillon's operational territories • To enhance service quality and user experience • To strengthen security measures protecting user assets and data

		• In response to force majeure events that might affect Stabillon's ability to fulfill its obligations For critical changes, the governance process includes direct participation rights of Stabillon European EMTs holders, reflecting Stabillon's commitment to community involvement in significant decisions affecting the ecosystem. This structured approach to governance aligns with MiCA's principles of accountability, transparency, and security in digital asset management. Stabillon reserves the right to periodically amend the rights and obligations associated with its Stabillon European EMTs. In accordance with Article 51 of the MiCA regulation, any significant new factor, material mistake, or material inaccuracy that could affect the assessment of Stabillon tokens will be described in a modified version of this Information Document, notified to the competent authorities, and published on Stabillon's website. Token holders will be informed of any changes through updates to this Information Document, the Redemption Plan on Stabillon's website, and through system logic embedded in the software of the published Smart Contract.
D.3	Description of the rights of holders	Stabillon has implemented financial management standards to ensure the security of customer funds under all circumstances. Customer funds collected for the purpose of issuing electronic money tokens will be held in segregated bank accounts until redemption rights are exercised. In the event of Stabillon's insolvency, a business continuity plan will be activated to ensure the continuity of Stabillon's operations. Funds received in exchange for Stabillon European EMTs are protected against any claims from other creditors of Stabillon, including in cases of enforcement or insolvency proceedings against Stabillon. If a situation of serious financial difficulties or insolvency occurs, Stabillon will activate its Recovery Plan and/or redemption plan to enable Stabillon European EMTs holders to exercise their right to redeem Stabillon European EMTs, in accordance with the provisions of sections D.4 and D.5 below.
D.4	Rights in implementation of recovery plan	**Stabillon's Recovery Plan** will be filed with the relevant regulatory authority within six months of the date of the public offer or admission of the token to trading, in accordance with the requirements of Article 55 of the MiCA

		regulation. This section may be updated after the Recovery Plan is filed to reflect any regulatory comments or changing market conditions. **Possible actions under the Recovery Plan** In the event of extraordinary circumstances that trigger the Recovery Plan, Stabillon may be forced to temporarily introduce restrictions on EMT (e-money tokens) redemption to ensure system stability and protect the interests of all token holders. Example remedial measures that may be implemented in such situations include: • **Liquidity fees** - temporary fees on EMT redemption to manage exceptionally high withdrawal volumes; • **Daily redemption limits** - established both at the aggregate supply level (e.g., as a percentage of all tokens in circulation) and at the individual user wallet level; • **Temporary suspension of redemption** - applied exclusively as a last resort measure under conditions of extreme market stress. **Communication and transparency** Any restrictions will be immediately communicated to EMT holders: • through Stabillon's official website, • and directly - through communication channels used in customer relations (e.g., user platform or other established forms of contact). **Purpose and operating principles** The measures described above will be temporary in nature and will be implemented exclusively during periods of significant market stress. Stabillon's priority will be to restore normal redemption conditions as quickly as possible, while ensuring compliance with regulatory requirements and in cooperation with appropriate supervisory authorities. The overarching goal of the Recovery Plan is to balance the protection of token holders' rights with the necessity of maintaining the integrity and liquidity of the system under crisis conditions. The overarching goal of the Recovery Plan is to balance the protection of token holders' rights with the necessity of maintaining the integrity and liquidity of the system under crisis conditions.

D.5	Rights in implementation of redemption plan	In accordance with Article 55 of MiCA, Stabillon will submit a detailed Redemption Plan to the relevant regulatory authorities within six months of making Stabillon European EMTs available in the European Economic Area In accordance with Article 55 of Regulation (EU) 2023/1114 (MiCA), Stabillon will prepare and submit a detailed Redemption Plan to the Financial Supervision Authority. This document will be submitted within six months of making Stabillon European EMTs available on the market in the European Economic Area (EEA). The Redemption Plan will serve as an operational framework for crisis situations when Stabillon is unable to fulfill its obligation to redeem tokens from their holders through normal operations. After approval by the supervisory authority, the content of this section will be updated with details of the specific plan. **When will the Redemption Plan be triggered?** The Redemption Plan can only be triggered based on a decision by the competent supervisory authority - such as a national financial market regulator. Such a decision may be made when there is reason to believe that Stabillon: • Is in financial distress and cannot fulfill its obligations to token holders, • Has entered bankruptcy or restructuring proceedings, • Is subject to resolution actions initiated by the supervisory authority, • Has lost its authorization as an e-money token issuer under MiCA, • Or in other exceptional cases provided by law. **How does redemption work in a crisis situation?** When the supervisory authority triggers the Redemption Plan, individual redemption requests under normal procedures will be temporarily suspended. Instead, Stabillon, in close cooperation with the supervisor, will implement an orderly redemption process for all token holders simultaneously. Main principles of this process: • Fairness and equality - all token holders will be treated equally, regardless of country of residence, investment size, or token distribution channel. • Security - redemption will be conducted transparently, using secure channels for data and funds transmission. **How will you know the Redemption Plan has been triggered?**

		After plan activation, Stabillon will publish an official announcement, available at minimum through the following channels:
		
		• Stabillon website,
		• Official social media profiles,
		• Direct email to token holders (if contact is available),
		• Additionally, possible publication by the supervisory authority.
		
		The announcement will contain all key information needed to participate in the redemption process:
		
		• The exact date and time of plan activation,
		• Detailed instructions on how and where to submit a redemption request,
		• Minimum required information set, such as:
		  ○ Identity verification,
		  ○ Number of tokens held,
		  ○ Bank account details,
		  ○ AML/CFT information, compliant with anti-money laundering regulations,
		• Application deadline - predetermined and sufficiently long for all interested parties to apply,
		• Redemption conditions that will apply during plan implementation,
		• Contact details for technical support and customer service.
		
		Your rights under the Redemption Plan
		
		Holders of Stabillon European EMTs tokens have the following rights within the redemption process:
		
		1. Right to information - full access to clear and up-to-date information about the procedure.
		2. Right to fair treatment - every person will be served on equal terms.
		3. Right to data protection - all personal data will be processed in accordance with GDPR and protected against unauthorized access.
		4. Right to support - access to technical assistance and answers to questions.
		5. Right to appeal and file complaints - in case of problems, there will be an option to use the complaints procedure or report the matter to the competent supervisory authority.
		6. Right to effective implementation - the redemption process must be conducted reliably, without undue delays.

D.6	Complaint Submission	If you have a complaint, please first contact Stabillon at contact@stabillon.com, or visit the Stabillon Support Portal.

D.7	Complaints Handling Process	**What is a complaint?** A complaint is any expression of dissatisfaction regarding: • The issuance, offer, or admission to trading of tokens, • Services provided by Stabillon or a third party that distributed our tokens. A complaint may be filed by any natural or legal person, including consumer organizations representing our token holders. **How can you file a complaint?** Complaints can be filed: • Electronically (e.g., via email or through a form available on the website), • In paper form (by mail or in person). Filing complaints is free of charge. They can be submitted in: • The language in which we offer our services or communicate with customers, • The official language of the country where the Issuer operates (Poland - Polish), • The official languages of EU countries where we operate. **What should a complaint include?** To process your complaint efficiently, please provide: • Contact details (name, surname, email address, phone number), • Description of the event that caused dissatisfaction, • Transaction or token reference number (if known), • Information about damage or problem (if applicable), • Documents confirming the facts (if available). You may use our complaint form, but this is not mandatory. **What happens after filing a complaint?** At Stabillon, we care that every customer and user of our tokens is treated fairly, with respect and transparency. That's why we've created a clear complaints procedure that allows for quick and fair resolution.

Confirmation of complaint receipt

Immediately after receiving your complaint - whether submitted via email, online form, or paper - you will receive confirmation that it has been registered. We will indicate the date of receipt and assign it an individual reference number. If you submit a complaint through the online form, we will additionally send you a copy of the submission. Timeline: no later than the next business day from receiving the complaint.

Verification of submission completeness

We will then check whether your complaint contains all necessary information to allow us to reliably review it. If we notice gaps (e.g., missing documents, unclear event description), we won't reject it - we'll contact you with a request to complete the information. Timeline: within 3 business days of registering the complaint.

Initial analysis and case assignment

After verifying completeness, we'll assign your case to the appropriate department - depending on its nature, this may be the operational, legal, or technical team. If the complaint concerns a partner (e.g., a third party that distributed tokens), we'll inform you and - if possible - provide contact details for that institution. Timeline: within 5 business days of receiving the complete complaint.

Analysis and investigation

At this stage, we gather information, technical logs, internal documents, and - if necessary - contact third parties. We strive to understand exactly what happened and what actions we should take.

If the case requires more time, within 10 business days of filing the complaint, we'll inform you about the status of the proceedings and when you can expect a response.

Response to complaint

Our goal is to provide you with a response no later than 30 calendar days from receiving the complaint. The response will include:

- Stabillon's clear position,
- Justification for the decision made,
- Information about further possible steps, e.g., the possibility of referring the matter to the Financial Ombudsman, Financial Supervision Authority, or ADR entity.

		If we cannot respond within 30 days (e.g., due to the need to obtain data from a foreign partner or technical analysis), we'll inform you no later than day 30 and provide a new completion deadline - no longer than 60 calendar days. 30 days - standard maximum response time. 60 days - only for particularly complex complaints (with justification for the delay). **What if we don't respond on time?** If we don't respond within the deadline and don't justify an extension - the complaint is automatically considered resolved in accordance with your request. This solution results from applicable legal provisions. **Complaint analysis and service quality** Every complaint is valuable information for us. We analyze them regularly to: ● Identify recurring problems, ● Improve our services and communication, ● Prevent similar situations in the future. All complaint information is securely stored for 6 years in accordance with regulatory requirements. The Customer Service Department remains the sole point of contact for customers throughout the complaint process, serving as the first line of support, escalating reports within the internal organizational structure when necessary.
D.8	Dispute Resolution Mechanism	At Stabillon, we place great importance on transparency and quality of customer service. Therefore, we have developed a consistent and simple complaint handling process, which we describe in this whitepaper. Our goal is to ensure that every concern raised by users is taken seriously and that responses are provided as quickly as possible, in accordance with legal requirements (including MiCA, GDPR, and the 2015 Act on handling complaints by financial market entities). **How customers can file complaints** We want filing a complaint to be as simple and accessible as possible for every user. Therefore, we offer several parallel channels:

- **Online form** – available in the service and application, allows quick transmission of all necessary information,
- **Email** – complaints can be sent to reklamacje@stabillon.com,
- **Hotline** – available during business hours, enables voice complaint submission; additionally, we offer audio/video call options in the application,
- **Traditional mail** – for customers who prefer paper form, we accept letters at the company's correspondence address.

Phone and video conversations may be recorded for evidentiary purposes – a practice used in the financial sector that increases security for both parties. If consent to recording is not given, the customer can always choose written or email form.

To expedite complaint processing, we recommend including in the submission: contact details, event description (preferably step-by-step of what happened), date and time, account/EMT/transaction number (if applicable), expected problem resolution method, and attaching supporting documents (e.g., screenshots or transaction confirmations).

Complaint categories

Each submission is assigned to one of several categories. This way we immediately know which team should handle it:

- **Operational** – includes e.g., technical login problems, temporary platform unavailability, or incorrect functioning of user modules. Such submissions usually go to IT and Customer Service departments.
- **Payment** – concerns unauthorized transactions, incorrectly posted operations, or improperly calculated fees and commissions. We act with priority in such matters as they can directly affect customer funds.
- **Data security** – covers situations where a user suspects data leakage, account takeover, or other breach of confidentiality. These are handled by the Data Protection Officer in cooperation with the security team.
- **Regulatory and compliance** – related to obligations arising from MiCA, e.g., EMT redemption refusal, fee uncertainties, or other legal issues. These complaints require analysis by Compliance and legal departments.

Additionally, each category has an assigned priority – e.g., unauthorized transactions and security incidents are classified as highest priority (P1) and handled first.

Response deadlines

Response time is crucial for user trust. Therefore, we have implemented clear rules:

- **Acknowledgment of receipt** – within 24 hours the customer receives an email with case number and contact to the handler,
- **Standard response** – within 30 calendar days from submission,
- **Payment matters** – we resolve within 15 business days, and if the matter is exceptionally complex, maximum 35 business days; the customer always receives information about reasons for deadline extension,
- **Data security incidents** – DPO takes action within 72 hours, in accordance with GDPR (e.g., notifies data subjects if necessary).

This way the customer knows what to expect and when they will receive a resolution.

How complaint analysis proceeds

The internal process is divided into several steps:

1. **Registration** – complaint enters the system, receives a unique number and is assigned to the appropriate category.
2. **Substantive analysis** – the team verifies facts, analyzes documents, system logs, or transaction history. If needed, we ask the customer for additional information.
3. **Decision and response** – customer receives detailed explanation, including legal or contractual basis. If the complaint is upheld, we also indicate the timeline for actions, e.g., refund.
4. **Closure and conclusions** – besides providing a response, we ensure each submission becomes a source of knowledge. We analyze the problem's cause and – if necessary – introduce corrections in processes or systems.

Appeal options

If a customer disagrees with our decision, they can file an appeal within 14 days of receiving the response. Then the matter goes to a Board member who did not participate in the original review. This ensures objectivity of reassessment. We respond to appeals within 21 days.

External claim resolution paths

When internal procedure doesn't bring satisfactory results, customers have the right to contact:

		1. Financial Supervision Authority (KNF) Possibility to report the matter to the financial market supervisory authority, particularly in case of suspected violation of MiCA regulations or other regulations: Correspondence address: Komisja Nadzoru Finansowego ul. Piękna 20 00-549 Warsaw Or email: knf@knf.gov.pl More information and forms are available at: www.knf.gov.pl **2. Financial Ombudsman** If the dispute concerns individual customer claims against Stabillon (e.g., token redemption refusal, system malfunction, lack of fund refund), it's possible to file a request for intervention or mediation to the Financial Ombudsman: Correspondence address: Office of the Financial Ombudsman ul. Nowogrodzka 47A 00-695 Warsaw Or email: biuro@rf.gov.pl The Ombudsman offers help in the form of intervention and mediation proceedings, and also provides legal advice. Details and forms are available at: www.rf.gov.pl **3. President of UODO** Personal Data Protection Office ul. Stanisława Moniuszki 1A 00-014 Warsaw 22 531-03-00 kancelaria@uodo.gov.pl The customer has the right to file a lawsuit in the competent court according to the Civil Procedure Code. Due to Stabillon's headquarters in Warsaw, the locally competent court is the District Court for the Capital City of Warsaw, although depending on the value of the dispute it may be the District Court (for matters up to 75,000 zloty) or the Regional Court in Warsaw (for matters exceeding this amount). The exact jurisdiction of the court division depends on the nature of the case - commercial matters are handled by commercial divisions, while civil matters by civil divisions. This is a path ensuring binding resolution of the dispute by an independent judicial authority. **Documentation and trend analysis** We register every submission in a central system. The register contains not only the case description and decision but also its category, root cause, and response time. The documentation system serves not only to ensure consistency of issued decisions but primarily to identify recurring systemic problems that may require changes in processes or technology. Analysis of collected data allows for continuous improvement of customer service processes and proactive elimination of potential problem sources. Regular complaint review also enables detection of trends and patterns, which translates into better understanding of platform users' needs and expectations. The documentation system also meets regulatory requirements arising from MiCA regulations, enabling preparation of required reports for supervisory

		authorities. Stabillon ensures that all complaint data is stored in accordance with applicable personal data protection regulations, maintaining appropriate retention periods and information security principles.
D.9	Token Value Protection Schemes	Yes
D.10	Token Value Protection Schemes Description	As a regulated e-money token compliant with MiCA regulation, Stabillon European EMTs will be fully backed by a 1:1 reserve in the official currency to which it is pegged (e.g., PLN or EUR). **Immediate availability of funds** • **≥ 30%** of all received deposits is permanently maintained in segregated accounts at credit institutions. • These funds are completely separated from Stabillon's operational funds and can be used for immediate token redemption at face value (1 token = 1 PLN/EUR). **Conservative investment policy** • **≤ 70%** of remaining funds are invested exclusively in secure, highly liquid financial instruments with minimal market, credit, and concentration risk, meeting the criteria of Article 38(1) of MiCA. • All assets are denominated in the same currency as the token, eliminating exchange rate risk. **"Bankruptcy-remote" structure** • Reserves constitute a separate trust estate for the benefit of Stabillon European EMTs holders. In the event of Stabillon's insolvency, the company's creditors have no access to them, and tokens are subject to redemption at face value.
D.11	Compensation Schemes	No
D.12	Compensation Schemes Description	Not applicable
D.13	Applicable law	The rights and obligations of EEA residents arising out of the use or ownership of Stabillon European EMTs will be governed by the laws of Poland.

D.14	Competent court	Any dispute concerning the rights and obligations of EEA residents arising out the use or ownership of Stabillon European EMTs shall be brought exclusively to the Commercial courts of Warsaw, Poland, except where provided otherwise by Applicable Laws.

PART E - EMT UNDERLYING TECHNOLOGY		
E.1	Distributed ledger technology	Distributed Ledger Technology (DLT) is an innovative form of data recording and exchange that changes how financial systems function. Instead of storing information in one central database, DLT records it simultaneously in multiple locations (called network nodes). Each network participant has the same copy of the ledger, and transactions are jointly approved by nodes using a consensus mechanism. This makes data resistant to manipulation, secure, and constantly available - without the need for a central operator. In the Stabillon European EMTs project, we leverage DLT's potential by combining a private blockchain network (Billon Unified Blockchain) with public blockchain platforms, providing a unique combination of security, compliance, and flexibility. • **Private ledger (Billon Unified Blockchain)** serves as a trusted, regulated technological layer. In this closed network, operations requiring supervision and regulatory compliance occur - including token minting and redemption, AML/KYC controls, identity verification, and resource access management. Thanks to full control over the infrastructure, it can be adapted to legal requirements and integrated with financial institutions. • **Public blockchains**, such as Ethereum, give users access to the decentralized finance (DeFi) ecosystem, blockchain wallets, and applications. Thanks to the "multi-chain" architecture, Stabillon tokens can freely move between Billon Unified Blockchain and supported public networks. Users can therefore use the token in their preferred environment without compromising security or regulatory compliance. This combination of two worlds - private and public blockchain - allows combining the advantages of both approaches. Financial institutions gain a stable and secure environment meeting rigorous standards, while individual

		users can conveniently use tokens in wallets and applications they already use. The Stabillon solution is designed with the future in mind - the infrastructure is scalable and ready for integration with new blockchain platforms that appear on the market. This enables quick adaptation to changing user needs and technological requirements while maintaining full regulatory compliance and high security standards. Stabillon's electronic money tokens (EMT) operate on selected blockchain platforms through the "changechain" function. This approach enables tokens to move between Billon Unified Blockchain and various public blockchain platforms (e.g., Ethereum), creating a flexible ecosystem that meets diverse user needs: 1. **Cross-platform exchange**: Users can send and receive Stabillon European EMTs on their preferred blockchain platform, such as Ethereum, Polygon, or other supported platforms. 2. **Dedicated node groups**: Each supported blockchain platform has a dedicated group of nodes within the Stabillon infrastructure that handles token minting, redemption, and verification processes. 3. **Smart Contract Integration**: Advanced Smart Contracts facilitate smooth transitions between platforms while maintaining 1:1 token backing with official currency.
E.2	Protocols and technical standards	Stabillon European EMTs operates based on two complementary blockchain environments: • **Billon Unified DLT** - a private, distributed infrastructure designed with compliance to European electronic money regulations in mind. In this environment, key operations are carried out such as token minting and burning, AML/KYC controls, and user identity registration. Billon Unified DLT ensures full control over token circulation and enables integration with traditional financial infrastructure. • **Ethereum** - a public blockchain supporting smart contracts and the ERC-20 standard. In this environment, it is possible to store and transfer Stabillon European EMTs tokens in a decentralized manner. Smart contracts deployed on Ethereum are responsible for token transfers, ensuring automation, transparency, and security without intermediaries. The use of Ethereum enables interoperability of the Stabillon European EMTs token with a broad ecosystem of decentralized applications (dApps),

		exchanges, wallets, and financial services supporting the ERC-20 standard. This allows users to use tokens in a familiar and trusted environment, while developers gain the ability to integrate with existing DeFi solutions. Presence on Ethereum, as the reference blockchain for smart contracts, also ensures high technical compatibility and future flexibility — tokens can be easily transferred or supported on other EVM (Ethereum Virtual Machine) compatible platforms. Both environments are interconnected - Stabillon's technology enables transferring tokens between Billon Unified DLT and Ethereum, while maintaining 1:1 coverage in fiat currency and full regulatory compliance. Token issuance and redemption always remain the exclusive competence of the issuer, who uses smart contracts integrated with the banking system and regulatory compliance layer. In case of extending token support to other blockchain platforms, Stabillon will update the information document, ensuring transparency and compliance with applicable regulations.
E.3	Technology Used	Here's the English translation of the Polish text: Stabillon uses a modular smart contract architecture compatible with EVM, extending classic token standards (e.g., ERC-20) with functions necessary for regulatory compliance and market needs. These functions include: ● Token issuance and redemption from multiple liquidity reserves (different banks), ● Reserve attestation logging, ● Fee settlement, ● Compliance mechanisms (including blacklists, fund freezing), ● Upgrade capability without losing account state history. Thanks to the modular structure (so-called facet modules), it's possible to securely manage changes in the contract code without affecting token balances and supply. **Billon Unified DLT - Distributed Platform** The Billon platform operates on a distributed network of nodes with various functions: ● Minting Nodes - token creation/burning, hardware-secured (HSM), ● Corporate Nodes - API for clients and business systems, ● User Nodes - mobile/PC applications serving as user wallets, ● Maintenance Nodes - data storage and ensuring DLT integrity. **Integration with Blockchains** Stabillon can support various blockchain platforms, currently supported are: ● Main network: Billon Unified DLT, ● Integrations with: Ethereum, ● Additionally: support for non-EVM blockchains such as Solana or Stellar, according to native token standards (e.g., SPL, Stellar Assets).

		In the future, we plan to provide functionality for many popular blockchain platforms. The list of planned integrations is available on the Stabillon Website. **Advanced identification and monitoring tools** Stabillon uses advanced technological tools for customer identification and transaction monitoring, including the Sumsub platform - a leading solution for identity verification and AML/KYC compliance. Integration with Sumsub provides: • Automatic identity verification - advanced recognition of identity documents from over 220 countries, biometric verification and real-time fraud detection, • Comprehensive AML screening - automatic customer checking against international sanctions lists, PEP (Politically Exposed Persons) lists and negative databases, with continuous real-time updates, • Transaction monitoring - advanced algorithms analyzing transaction patterns to detect suspicious activities, money laundering and terrorist financing, in accordance with 5th AML directive requirements, • Customer risk management - dynamic assignment of risk profiles to customers based on their characteristics, transaction history and geographical location, • Compliance process automation - seamless integration with Stabillon systems via API, enabling automatic customer acceptance decisions and flagging of suspicious transactions, • Regulatory documentation - comprehensive reporting and documentation of verification processes according to European regulator requirements, including automatic generation of reports for supervisory authorities. User verification results are published in Billon's TDM (Trusted Document Management) system, ensuring durability and auditability of information through immutable registration in a distributed blockchain ledger. The use of the Sumsub platform allows Stabillon to meet the highest security and regulatory compliance standards while ensuring a smooth user experience during the onboarding process and use of Stabillon European EMTs tokens.
E.4	Purchaser's technical requirements	Purchasers wishing to directly access Stabillon European EMT issuance or redemption services must meet the following technical requirements: 1. Corporate Account: Maintain a registered account with Stabillon's Corporate Account system, which serves as a bridge to the blockchain infrastructure. 2. API Access: Implement secure API connections to Billon's middleware components, including the IPE/AR (Issuance Processing Engine/Attestation Repository) system.

		3. Authentication: Support multi-factor authentication and comply with Stabillon's security protocols. 4. Compliance Systems: Integration capabilities with Billon's Trusted Document Management (BTDM) solution for regulatory compliance and identity verification. 5. Banking Safeguarding accounts and traditional payment schemes : Established connection to supported banking systems for fiat on/off-ramping. Token holders accessing Stabillon European EMTs via secondary markets or third-party platforms require: 1. Compatible Wallet: A wallet supporting ERC-20 tokens or other blockchain protocols supported by Stabillon European EMTs. 2. Exchange Account: An account with an EU-regulated crypto-asset service provider that lists Stabillon European EMTs. 3. KYC Verification: Completion of the Know Your Customer process as required by the third-party platform. Stabillon European EMTs are designed to operate across multiple blockchain protocols, prominently featuring: 1. Billon Unified Blockchain: Billon's proprietary blockchain solution that offers optimized performance for regulated financial transactions. 2. Ethereum: Support for the Ethereum blockchain network, providing broad compatibility with the DeFi ecosystem. 3. Additional Supported Chains: Future blockchain protocol support will be announced and documented on the official website. Users should be aware that Stabillon European EMTs implement a flexible fee structure that may vary based on: 1. Operation Type: Different fees may apply for issuance, redemption, transfers, and cross-chain operations. 2. User Category: Institutional users may have access to different fee structures than retail users. 3. Volume: Transaction volume may affect applicable fees, with potential volume discounts for high-volume users. 4. Batch Assignment: Users may be assigned to different fee batches based on their usage patterns and agreements with Stabillon. All fees are transparently encoded in the smart contract and published in accordance with MiCA requirements.

		For technical integration support, institutional users can contact Stabillon's dedicated support team. Retail users accessing Stabillon European EMTs via third-party platforms should direct technical inquiries to the respective platform's support services.
	Security	Security is the foundation of the Stabillon platform and is integrated across multiple layers of the Stabillon European EMTs infrastructure. Each transaction on the network is protected through advanced cryptographic techniques, including asymmetric encryption. User data is encrypted on the client side, preventing unauthorized access even if nodes or intermediaries are compromised. This approach ensures that sensitive data remains secure throughout its entire lifecycle in the distributed ledger. Multi-layered digital signatures are used to authenticate transactions. A key element of the security infrastructure is the use of Hardware Security Modules (HSMs) for storing private keys. These specialized devices offer the highest level of tamper protection, safeguarding against both physical and digital threats, which constitutes a fundamental element of cryptographic infrastructure protection. The Multisignature system requires a minimum of two signatures by authorized persons to perform main and critical operations, such as approving redemption lists. This solution eliminates risks associated with single points of failure and prevents unauthorized access to critical system functions. The Stabillon European EMTs Smart Contract architecture uses a modular construction that enhances security through compartmentalization (appropriate code segmentation). This construction enables selective updates to specific aspects without affecting the entire system, minimizing the attack surface during updates. Additionally, integration of the Pausable function provides the ability to immediately disable fragments of smart contracts in case of detected vulnerability or threat, ensuring rapid response to potential security incidents. The contract contains multiple additional safeguards, including: • Timelocks for critical operations • Multi-signature requirements for administrative functions • Role-based access control with principle of least privilege • Formal verification of key components • Comprehensive event logging for transparency Daily reserve attestations are cryptographically linked to the blockchain through IPFS checksums or data and document storage solution on the

		Billon Unified Blockchain system, creating an immutable audit trail of backing. These attestations are verified through a decentralized consensus mechanism that prevents single points of failure in the verification process. The advanced smart contract update governance system, described in the "Key Governance Declaration," ensures that any protocol changes go through a multi-level verification and approval process. This system engages Proposers, Governance Guardians, and includes a veto mechanism for token holders, effectively preventing unauthorized or potentially harmful modifications. The Billon Unified Blockchain platform uses decentralized key management protocols that eliminate single points of failure. This increases the system's resilience to cyberattacks, such as distributed denial-of-service (DDoS) attacks, which can paralyze centralized infrastructures. The Corporate Account System utilizes hierarchical deterministic wallets with threshold signatures, enabling institutions to securely manage keys while maintaining operational flexibility. All key actions in the system, including logging in and executing transactions, require two-factor authentication (2FA). Integration with Corporate Account is secured through an API key system, where communication occurs exclusively through encrypted REST requests with authentication tokens in headers. API keys are generated once by authorized administrators, with the ability for immediate deactivation in case of suspected security breach, ensuring full control over system access and all executed operations. The security architecture includes advanced threat detection systems that monitor network activity in real-time to identify patterns associated with potential security breaches. For transaction monitoring on blockchain platforms, Stabillon implements specialized monitoring agents that track transaction patterns and flag anomalous activities. Through these multi-layered security measures, Stabillon European EMTs create a solid foundation for institutional-grade digital currency operations that meet the stringent requirements of MiCA regulation while providing the security guarantees expected by financial institutions.
E.5	Consensus Mechanism	Ethereum In 2022, Ethereum transitioned to Proof of Stake as part of "The Merge" update. In this model, validators deposit a specific amount of ETH as collateral (minimum 32 ETH), and the system randomly selects validators to

		create new blocks, proportionally to their stake. PoS significantly reduced energy consumption and improved network scalability. Billon Unified Blockchain Billon Unified Blockchain represents an innovative approach to distributed ledger technology, distinguishing itself through its unique architectural design. Unlike traditional blockchain solutions that utilize a linear chain paradigm, Billon implements a Multidimensional Directed Acyclic Graph (DAG) structure where individual transactions are interlinked into a provable history without central coordinators. This fundamental design choice means that each processing node functions as the center of its own graph, and no single node maintains a complete copy of the ledger, enhancing both privacy and efficiency. The platform employs different consensus mechanisms tailored to specific types of digital assets. For financial assets, Billon utilizes a hybrid proof-of-authority and proof-of-stake approach, where assets are created by authorized Minting Nodes, while transactions between nodes are verified using a proof-of-stake algorithm requiring approval from more than 50% of pseudo-randomly chosen validation nodes. This architecture supports an impressive array of asset types, ranging from non-fungible tokens and stable coins to fiat currencies and loyalty points, demonstrating the platform's versatility for various financial applications. Stabillon European EMTs operate within a structured governance system that encompasses a multi-tiered structure, including Proposers, Governance Guardians, and even veto rights for token holders. This means that any changes to the contract or policies are subject to a proposal and approval process with multiple checkpoints, preventing unilateral changes. On-chain governance and upgrade timelocks. Stabillon European EMTs are aligned with the spirit of MiCA's accountability and security, giving stakeholders a voice in key decisions. This governance approach strengthens trust between financial institutions and regulators, ensuring stable, rules-based operational management.
	Minting mechanism	Stabillon European EMTs introduces a breakthrough multi-liquidity-pool design that allows the Stabillon European EMTs to be issued by multiple authorized entities across different jurisdictions while maintaining a unified token. Unlike traditional StableCoins with centralized minting, Stabillon European EMTs support multiple segregated reserves (each with dedicated bank accounts and collateral) identified by unique pools in the smart contract. **Multi-minting** provides flexibility and expands on stablecoin innovation introduced by Circle France with the EUROC smart contract. This distributed architecture eliminates single points of failure and jurisdictional

		risks while enabling regulated financial partners in various countries to operate as mint operators under one cohesive framework. The system enforces full collateralization through mandatory attestations for each pool, automatically blocking minting from any pool with outdated verification. This coordinated liquidity management gives Stabillon European EMTs a significant competitive advantage: the ability to function as a true pan-European EMT with local issuance compliant with each jurisdiction's regulations. The architecture also facilitates streamlined cross-border settlements through atomic swaps between pools, allowing transfers to occur entirely within the Stabillon European EMTs ecosystem without external exchanges. The minting system is used by trusted institutions (e.g. financial ones) and it is subject to an annual security audit: 1. Access to Minting Application - Both Minting Application modules (an encryption module and clearing agent module) have their own user control systems, specifying both different role types and user categories. Only authorised institutions' employees have access to it. Each user authenticates itself via username and password (changed once a month). Additionally, the Minting Applications are only available in the internal trusted institution network (there is no public access). The detailed access control is described in the Minting Application manual which is an Appendix to this document. 2. Access to private HSM stored keys. The keys are decrypted each time the system is restarted. Depending on the implementation, decryption is performed directly on the HSM device (the decryption mechanism depends on the hardware type). In the software, HSM keys are decrypted directly in the Encryption Module. The decryption is done by a special user type (authorised by user name and password) who enters encryption keys (for production systems at least twenty-six character passwords are used). 3. Minting Node - The minting process is protected by private keys stored in HSM. Without keys, the system will not be able to create new assets. Additionally each Financial Institution has its own unique Identity. Each identity is needed to decrypt its keys. The keys are provided by configuration files while starting the given Minting Node. To add a new Minting Node (a new trusted institution) it is required to add new keys to the DLT code and configuration and this requires a programming change. In the future, it is planned that the Supervisory Node will be used for adding new Minting Nodes.
E.6	Incentive Mechanisms and Applicable Fees	According to Article 50 of MiCA, issuers of e-money tokens cannot grant interest on these tokens (understood as remuneration or other benefits related to the length of the period for which the e-money token holder is in possession of it, is considered interest. This includes net compensation or

		net discount with an effect equivalent to interest received by the e-money token holder, obtained directly from the issuer or through third parties that are directly related to the e-money token or take the form of remuneration or valuation of other products). Stabillon does not grant Stabillon European EMTs holders interest within the meaning of MiCA, however, incentives linked to their utilization have been provided. Fees and incentives provided by individual protocols depend on the pricing policy of their creators and are not dependent on Stabillon. Crypto-asset service providers are not authorized to grant interest when providing services related to Stabillon European EMTs. **Incentive Mechanisms** Stabillon European EMTs creates an incentive program for users and liquidity providers, transforming fees into adoption incentives and tools for establishing common goals. Stabillon European EMTs shares revenue with those who help the ecosystem. For example, authorized liquidity providers are rewarded based on their contribution to circulating supply - the contract tracks how much each operator has minted compared to redemption (their "net issuance") and periodically proportionally allocates rewards from accumulated fees. Each user wishing to participate in the fee/reward program must register their address and proposed fee batch identifier in the Smart Contract, and then automatically, when they deposit liquidity and Stabillon European EMTs are minted to them, the newly minted EMT tokens will be linked to their unique identifier. The contract enables users to negotiate the percentage of fees to be returned as rewards and selects the appropriate batch identifier for their tokens. These requests must be approved by an administrator to prevent abuse, but once activated, the user automatically receives rewards on the blockchain platform for transactions calculated by the Smart Contract. Incentive mechanisms in the Stabillon EMT ecosystem involve redistributing part of transaction fees among participants who actually increase liquidity and token trading volume. Bonuses go exclusively to addresses actively engaged in the market (e.g., liquidity providers, large order placers), not to EMT holders "just for holding." Joining these mechanisms is voluntary: the address must be independently registered in the appropriate module, and activation is confirmed by the network administrator. This function is not a default feature of the token, but an additional option for entities ready to actively support the market. This model motivates maintaining deep liquidity and stable spreads, while eliminating the incentive for passive capital allocation solely to obtain "interest." No interest configuration capability: The reward system code contains no data structures or functions enabling the definition, calculation, or

		distribution of interest. The reward system is limited to transactional events and does not allow configuration of benefits dependent on holding time. **Fees:** Stabillon does not charge any fees for minting or redemption of Stabillon European EMTs tokens. Tokens are minted and redeemed at face value, maintaining full parity with euro (1 EUR EMT = 1 EUR) or other supported currency specified during Smart Contract deployment. This means that the end user bears no costs related to acquiring or realizing the value of Stabillon European EMTs, provided these operations are conducted directly with the issuer and in accordance with Smart Contract terms. **Transaction Fee Structure** Although minting and redemption are fee-free, using the token may involve transaction costs for other operations, such as EMT transfers between users or moving assets between different blockchain platforms. The fee structure is flexible and may depend on several factors: **Type of operation** ● Transfer of Stabillon European EMTs within the Billon network - minimal operational fees may apply, set dynamically and recorded in the Smart Contract. ● Transfer of Stabillon European EMTs between different blockchain platforms (e.g., Billon ↔ Ethereum) - fees are calculated based on current "gas" costs in the given network and operational margin related to transfer handling. **User category** Users may be assigned to different tariff categories, depending on their role in the ecosystem: ● Individual clients use the basic, publicly available fee structure. ● Institutional clients may gain access to individually negotiated terms, including reduced rates or additional financial incentives. **Transaction volume** The fee structure may be progressive - users executing large transaction volumes may qualify for volume discounts or refunds of part of charged fees. **Assignment to tariff groups** The issuer reserves the right to assign users to specific tariff groups based on their transaction history, token usage method, or signed cooperation agreements. These groups may benefit from separate fee conditions. **Reward program for selected market participants** Stabillon operates a reward system aimed at strategic market participants, including large institutional investors and entities providing token liquidity. The program allows for negotiating individual terms, such as: ● negotiated transaction fee structures, ● bonuses for large transaction volume,

		• participation in fees charged within the ecosystem as a form of reward for providing liquidity. Reward program terms are established individually within bilateral agreements with the issuer and are not part of the standard EMT offer available to all users. **External intermediary fees** Users acquiring Stabillon European EMTs through external platforms, such as cryptocurrency exchanges or token trading platforms, may be required to bear independent transaction fees that are not set or collected by the issuer. Stabillon is not responsible for the fee policy applied by intermediaries, and users should familiarize themselves with the regulations of these entities before making transactions. Transparency and MiCA compliance In accordance with MiCA regulation requirements, all fees and costs are recorded in the Stabillon European EMTs Smart Contract in a clear and immutable manner. The current fee structure is also published in the issuer's technical documentation and on Stabillon's official website, and in case of regulatory obligations - also in appropriate supervisory registers.
E.7	Use of Distributed Ledger Technology	Yes - Billon Unified Blockchain is developed by Billon Group companies. Stabillon is pursuing multi-technology product development with the choice of which technology stack to use in the hands of end users with the ability to execute cross-chain transactions.
E.8	DLT Functionality Description	Billon Unified Blockchain is a modern, fully decentralized ledger that operates as a "virtual team" of nodes, without a single boss or notary. Each node stores a fragment of the shared database and continuously exchanges information with others, allowing the network itself to maintain consistency and security. This model eliminates the risk of a single point of failure - even when some nodes are temporarily offline, the rest continue working, and data remains secure and immutable. Nodes in the network play different roles but work together: **User nodes** are lightweight "client" installations that can run on a smartphone, laptop, or IoT device. They allow each individual user quick access to the network and their own data. **Corporate nodes** offer additional interfaces (APIs), enabling companies to easily connect their own systems - whether web applications, mobile apps, or server backend - and securely use blockchain functions.

		Privileged minting nodes handle token issuance and burning and ensure the highest level of transaction security. Through integration with HSM hardware modules, critical operations are protected at the hardware level, and a cluster of such nodes ensures operational continuity even under heavy load. The entire ecosystem is extremely flexible - both huge corporations and small startups or individual users can adapt it to their needs. Lightweight library code runs on Android, iOS, Linux, and Windows systems, enabling seamless integration with virtually any application. Additionally, corporate clients are offered the option to restrict data access at a geographical level - for example, exclusively to the European Union area. Thanks to this architecture, Billon Unified Blockchain combines the advantages of public transparency with the privacy and control characteristic of corporate solutions. The network self-organizes, and each new node is automatically included in the collective work, allowing the whole to grow and adapt to user needs without central supervision. More technical details about how Stabillon EMT tokens work on Ethereum-compatible blockchains (EVM) can be found in the documentation at stabillon.com/api-hub, and a deeper description of Billon Unified Blockchain technology is available at billongroup.com/technology. **Consensus Mechanism** Billon Unified Blockchain supports multiple consensus mechanisms (consensus models are defined at the Operating Groups level and configured by a special Supervisory Node), but primarily uses proof-of-stake with algorithms designed to use a set of trusted nodes, which we call cooperative proof-of-stake consensus. Tokens issued on other distributed protocols use other consensus mechanisms native to those blockchains. **Ledger Data Structure (Privacy)** In Billon Unified Blockchain, user data - including financial assets, documents, and security keys - is stored directly in the blockchain ledger, not outside it. This approach eliminates the need for external databases or servers (off-chain), significantly increasing both security and system consistency. Every element with legal or financial significance goes "on-chain," making the entire system more transparent and harder to manipulate. At the same time, Billon protects user privacy in a unique way - the ledger is private by design, and its operators have no access to any stored data.

		Information is encrypted on the user side (client-side encryption) before it reaches the ledger. This means that even if the system operator had access to the infrastructure, they wouldn't be able to read the contents of any file or record. Importantly, the entire system operates without the need for specialized hardware for key storage (e.g., physical wallets or HSM modules). The applied technologies eliminate the risk of losing access to funds due to hardware failure while ensuring the highest level of security and data confidentiality. **Change Chain Function** The Stabillon European EMT solution enables users to securely transfer tokens between different blockchain networks. This function uses a Native Bridging mechanism providing native interoperability between platforms without the need for external bridges or intermediaries, and additionally the LayerZero OFT ("Omnichain Fungible Token") protocol for broad compatibility with less popular blockchain protocols. **Native Bridging Mechanism** As part of the "change chain" function, the system provides the client with a dedicated address for performing a cross-chain burn operation - a process that enables "burning" tokens on one blockchain platform and simultaneously "minting" their equivalents on the target platform. **Two-Stage Process** The blockchain platform change is carried out in two key stages: Stage 1: Target Address Verification The user must first prove that the wallet address to which they intend to perform the cross-chain transfer on the target blockchain platform exists and is valid. This process includes: ● Execution of a verification transfer by the client on the target blockchain platform ● Verification of this transfer by a component managed by the EMT token issuer (the so-called Minting Application) ● Sending confirmation of address validity back to the source smart contract Stage 2: Execution of Burn and Mint Operations After receiving confirmation of the target address validity: ● The smart contract on the source blockchain platform executes the "burn" function, destroying a specified amount of tokens

		• Simultaneously, the "mint" function is triggered on the target platform, creating a corresponding amount of tokens at the new address **Security and Integrity** This mechanism ensures full integrity of the cross-platform transfer process - the total amount of tokens in the ecosystem remains constant, and the operation is atomic and irreversible. By using Native Bridging, this process is significantly safer and more efficient than traditional external bridge solutions. **Outsourcing in Stabillon** Technical support and development services regarding the Stabillon EMT Platform are provided by other companies of the Billon Group. Stabillon has concluded three key agreements with Billon Group entities: **License Agreement** - providing rights to use all required technological components necessary for platform operation. **Maintenance Agreement** - covering comprehensive platform maintenance services, including infrastructure access, technical support, and customer service. **Development Agreement** - guaranteeing access to technical resources used for developing and improving Stabillon EMT Platform components. All agreements have clearly defined SLA (Service Level Agreement) indicators that guarantee an appropriate level of provided services. At the same time, securing operational flexibility, the agreements ensure Stabillon's right to use services from other companies providing maintenance and development services, eliminating the risk of dependence on a single supplier and strengthening platform operational continuity.
E.9	Audits	No
E.10	Audit Outcome	Audit in progress. After receiving the results, information will be updated and the audit report will be publicly available on Issuers web pages..

PART F - RISK INFORMATION

F.1 Issuer-Related Risks			
Risk	**Probability**	**Impact**	**Description**
Insolvency Risk	Low	High	This risk refers to a situation where the national electronic money institution, as the issuer of Stabillon European EMTs tokens, could lose its ability to meet financial obligations. This may result from deterioration of the issuer's financial situation, insolvency of partner institutions (e.g., banks holding reserves), or systemic financial crises. To mitigate this risk, funds received in exchange for Stabillon European EMTs tokens are held in segregated bank accounts and invested in accordance with Article 54 of the MiCA regulation, ensuring full 100% coverage of obligations to users.
Third-Party Dependency Risk	Medium	Medium	Stabillon uses services from external partners, particularly banks responsible for maintaining segregated accounts and executing monetary settlements. This risk refers to potential disruptions in providing these services, which may affect the issuer's ability to issue, redeem, or manage Stabillon European EMTs tokens on an ongoing basis. The issuer monitors the quality and continuity of cooperation with third parties and applies contingency procedures to limit the impact of possible interruptions or service unavailability on users.
Liquidity Management Risk	Low	High	In special circumstances, such as sudden and unusually high demand for Stabillon European EMTs token redemption, there may be a risk of temporary difficulties in immediately satisfying all redemption requests. This applies to situations where part of reserve assets cannot be immediately liquidated or requires time to convert to liquid form. The issuer conducts ongoing liquidity monitoring and applies reserve structures compliant with Article 54 of the MiCA regulation to minimize this risk and ensure the fastest possible redemption execution under any market conditions.
Security Breach Risk	Low	High	This risk refers to potential losses resulting from operational or technological security breaches, including fraud, theft, improper management of Stabillon European EMTs tokens or their reserves, as well as human errors or negligence. It also includes the risk of user personal and financial data leakage, caused by cyberattacks or unauthorized system access. The issuer implements advanced technical and organizational measures in cybersecurity and operational risk management, compliant with applicable regulations, to prevent such incidents and limit their effects.

Illegal Use Risk	Medium	Medium	This risk refers to the possibility of using digital wallets or transactions related to Stabillon European EMTs tokens in violation of law, particularly for money laundering, terrorist financing, or other criminal activities. The issuer applies security measures, KYC/AML procedures, and transaction monitoring systems compliant with applicable regulations to identify, counteract, and report cases of suspicious activity.
Data Protection Risk	Low	High	This risk refers to the possibility of breaching the confidentiality, integrity, or availability of users' personal data, particularly through unauthorized disclosure, theft, loss, or third-party access resulting from security incidents such as cyberattacks or system failures. The issuer implements technical and organizational measures compliant with personal data protection regulations, including GDPR, to ensure customer data security and limit the effects of potential breaches.
Industry Volatility Risk	High	Medium	This risk arises from operating in a dynamically developing and regulatorily inconsistent digital finance environment. Changes in laws, supervisory practices, technology, or market conditions may affect the issuer's operational model, the method of issuing and managing Stabillon European EMTs tokens, as well as market participants' expectations and behaviors. The issuer monitors changes in the regulatory and market environment and adjusts its operations to ensure compliance with applicable regulations and operational stability.
Legal Changes Risk (Regulatory Uncertainty)	High	High	The issuer operates in the European Union single market, in accordance with the legal framework established particularly by MiCA Regulation (EU) 2023/1114 and national implementing regulations. This risk refers to the possibility of changes in applicable regulations, their interpretations, as well as the issuance of executive acts or guidelines by EU institutions and national supervisory authorities. Although regulations have been harmonized, the area of digital token issuance remains relatively new, which is associated with potential evolution of supervisory practices and the risk of changes that may require adjustment of the issuer's operations. The issuer monitors regulatory environment developments and ensures ongoing operational compliance with applicable regulations.

Environmental Risk (Sustainability)	Low	Low	This risk refers to the potential impact of technologies used in issuing and servicing Stabillon European EMTs tokens on the natural environment. It particularly concerns differences in energy consumption between blockchain platforms - including the consensus mechanisms used. Stabillon prioritizes energy-efficient solutions, such as Billon Unified Blockchain and systems based on proof-of-stake mechanism, while avoiding platforms using energy-intensive proof-of-work models. These actions align with the strategy of supporting sustainable development and reducing the environmental footprint of technology.

F.2 Token-Related Risks			
Risk	**Probability**	**Impact**	**Description**
Collateralization Integrity Risk	Low	High	This risk refers to situations where - due to fraud, operational error, or improper management - reserve assets backing Stabillon European EMTs tokens could fall below the value of tokens in circulation. Such a situation, though unlikely, could disrupt token price stability and affect the issuer's ability to execute redemptions at face value. The issuer applies rigorous reserve management procedures, segregated accounts, and regular reserve attestations, in accordance with Article 54 of the MiCA regulation, to ensure full 1:1 coverage of obligations.
Collateral Liquidity Risk	Low	High	This risk concerns the possibility of limited marketability of some reserve assets in situations of extreme market conditions. Although reserves backing Stabillon European EMTs tokens consist of safe assets compliant with Article 54 of the MiCA regulation, some of them may not be immediately available in case of sudden and massive redemption demand. In such circumstances, temporary delays in fulfilling redemption requests may occur, despite full reserve coverage. The issuer manages asset structure considering stress scenarios to limit the impact of this risk on users.

Fraud Risk	High	Medium	Stabillon European EMTs token holders may be exposed to fraudulent activities by third parties. This risk includes phishing attacks, impersonation of the issuer or its team members, creation of fake tokens, unauthorized airdrop offers, and other forms of manipulation aimed at obtaining data or funds. The issuer conducts information and educational activities and warns against fraud attempts. Users are obligated to exercise caution, verify communication sources, and use only the issuer's official channels.
Tax Risk	High	Medium	The tax approach to token transactions varies by jurisdiction. Conversions between traditional currencies and tokens or between other digital assets and tokens may generate tax consequences that vary depending on local regulations.

F.3 Technology-Related Risks			
Risk	**Probability**	**Impact**	**Description**
Blockchain Infrastructure Risk	Low	High	This risk refers to the possibility of technical disruptions or attacks on the blockchain infrastructure on which Stabillon European EMTs tokens operate. These networks, despite high security levels, may be exposed to technological vulnerabilities, failures, or malicious activities (e.g., DDoS attacks, protocol errors). The effects of such disruptions may include transaction delays, temporary difficulties in token transfers, as well as unexpected liquidity shifts in the system. The issuer monitors technological risks and implements preventive measures in cooperation with blockchain solution providers.

Smart Contract Vulnerability Risk	Low	High	This risk concerns the possibility of errors or vulnerabilities in smart contract code used for issuing, redeeming, or transferring Stabillon European EMTs tokens, including transfers between different blockchain platforms (cross-chain). The company is in the process of preparing formal smart contract security audits (with external entities). Audits will be conducted and completed before the production launch of the offer. Regardless of audits, the company prepares and conducts tests (including unit, integration, and load tests) and implements programming best practices. Until these activities are completed, there is a small risk that some vulnerabilities may be exploited, which could result in unauthorized transactions or loss of funds. The issuer will continuously monitor smart contract operations and implement updates in response to detected threats.
Transaction Irreversibility Risk	Medium	High	Transactions involving Stabillon European EMTs tokens, once confirmed on the blockchain network, are generally irreversible. Sending tokens to an incorrect address, losing access to a private key, or lack of recipient consent to return them may result in permanent loss of funds. Stabillon cannot reverse or cancel transactions conducted on a decentralized network. Users are responsible for exercising due diligence when initiating operations and securing their access data.
Undetected Technology Error Risk	Low	High	Stabillon uses advanced and innovative technological solutions to ensure security, performance, and functionality of Stabillon European EMTs tokens. Despite conducting tests, audits, and quality control procedures, there is a risk of errors that were not previously detected, which may affect proper system functioning or operational continuity. Stabillon takes preventive actions and maintains rapid response mechanisms to limit the impact of potential technological failures on users and emission stability.

51% Attack Risk	Low	High	This risk refers to a situation where one entity or group of entities gains control over more than 50% of computing power or stake in the validation mechanism of a given blockchain network. Such a scenario could enable unilateral approval or rejection of transactions, threatening ledger integrity. This risk is minimal in the case of Ethereum network, which is characterized by high decentralization levels, significant user activity, and well-established proof-of-stake consensus mechanism. Over more than a decade of this technology's operation, no successful 51% attack on Ethereum has been recorded. The issuer uses only networks with established reputation and applies additional verification measures to minimize this risk.
Blockchain Network Discontinuation Risk	Low	High	This risk concerns situations where the public blockchain network used to service Stabillon European EMTs tokens loses community support, development funding, or sufficient number of active validating nodes. In such a case, weakening or complete loss of credibility of the consensus mechanism and network functioning may occur. In case of threat to public blockchain continuity, an emergency scenario is possible involving transition to private mode - through creating an independent fork of the existing network and launching private nodes managed by the issuer or its technology partners. The issuer monitors blockchain infrastructure stability and condition and has a plan ensuring operational continuity if such risk occurs.

F.4 Risk Mitigation Measures

Mitigation of Issuer-Related Risks

Mitigation Measure	Related Risks
Insolvency Protection	Insolvency Risk
Customer funds are legally protected and separated from company assets. In case of issuer insolvency, token reserves cannot be used to satisfy creditor claims.	
Third-Party Relationship Diversification	Third-Party Dependency Risk

Diversification of outsourcing services related to development and maintenance of Stabillon European EMT solution. Stabillon, under agreements signed with Billon Group, has the ability to commission development and maintenance work outside Billon Group companies. These agreements ensure operational flexibility through the right to use services from other companies providing maintenance and development services, eliminating single supplier dependency risk and strengthening platform operational continuity. Diversification of contacts with entities offering token trading. Planned listing of Stabillon European EMT on multiple crypto-asset exchanges (CASP) that meet MiCA requirements, ensuring greater token availability and liquidity.	
Technological Security	Security Breach Risk, Data Protection Risk
Stabillon uses proven components and technologies with documented reliability in production environments. Before each production deployment, we conduct comprehensive scenario tests and independent security audits. StableCoin EMT security architecture is multi-layered and includes advanced protection mechanisms. The company awaits independent security audits to be conducted before launching the system in production environment. New functionalities are introduced only after complete removal of identified vulnerabilities, in accordance with security procedures. All solutions are verified by external security auditors and subjected to rigorous penetration tests, ensuring the highest possible level of protection against potential security breaches and data violations. Key security architecture elements include: Client-side encryption using decentralized key management system eliminating central vulnerability points; Multi-layered digital signatures based on keys stored in Hardware Security Modules (HSM); Modular smart contract construction with Pausable function and selective update capability without affecting the entire system. Detailed description of all platform security mechanisms is provided in Section E of this document.	
Effective Liquidity Management	Liquidity Management Risk, Liquidity Constraint Risk
Our systems and procedures ensure the ability to execute redemptions within established timeframes, even during periods of increased market volatility or heightened redemption demand. We apply fund management policy compliant with Article 54 of MiCA where: at least 30% of received funds is always deposited in separate accounts at credit institutions; remaining received funds are invested only in safe assets with low risk qualifying as highly liquid financial instruments with minimal market, credit, and concentration risk, in accordance with Article 38(1) of the MiCA regulation, denominated in the same official currency as the currency to which the e-money token is linked.	
Financial Safeguards	Insolvency Risk, Collateralization Integrity Risk
Customer funds are stored in segregated accounts and fully cover the value of issued EMT tokens, ensuring full backing of all obligations to token holders. In case of situations causing exceeding standard redemption capacity, Stabillon provides for activation of Recovery Plan or Redemption Plan according to MiCA requirements.	
Comprehensive Compliance Framework	Illegal Use Risk, Legal Changes Risk

Stabillon undertakes extensive activities ensuring full regulatory compliance with applicable regulations regarding operations as an Electronic Money Institution and EMT token issuance. Stabillon's anti-money laundering and counter-terrorist financing (AML/KYC) systems meet all requirements set by the regulator for Electronic Money Institutions. An advanced, multi-level verification system has been implemented enabling effective customer identification and transaction monitoring for potential irregularities. A dedicated legal and compliance team monitors regulatory changes, enabling rapid adaptation to new requirements. Regular staff training and external audits ensure compliance with current regulations and industry best practices.	
Advanced Data Protection	Data Protection Risk
The system has comprehensive security measures compliant with GDPR. The applied distributed system provides a platform for electronic document management (TDM - Trusted Document Management) with an immutable, unchangeable document registry for better data management and sharing. Data protection effectiveness has been confirmed by large clients such as Tauron S.A., BIK S.A., European Commission (EBSI project) and by external legal analyses. The solution is fully compliant with Durable Medium and GDPR regulations.	
Adaptive Business Strategy	Industry Volatility Risk
Currency diversification - issuing multiple different currencies allows independence from business success of a single currency. Simultaneously, such strategy enables operation in less competitive markets for smaller local currencies. Diverse target markets include strategic business areas: a) Building solutions for medium enterprises enabling liquidity management across multiple markets; b) Integration with CASP exchanges building a bridge between traditional finance and crypto-assets, enabling on-ramp and off-ramp; c) Building solutions with Acquirers enabling online payment settlement.	
Active Regulatory Supervision	Legal Changes Risk, Regulatory Risk
We have implemented a comprehensive active regulatory supervision system consisting of several integrated components: (1) Dedicated legal-regulatory unit - team of specialists with experience in crypto-assets, fintech, and electronic money, operating in organizational structure at management level; (2) Multi-level regulatory monitoring system - including ongoing analysis of: EU legislative projects (especially MiCA updates), supervisory authority communications (EBA, ESMA, KNF and other local regulators in operating countries), precedent regulatory decisions regarding competitive entities, and industry self-regulatory initiatives; (3) Proactive compliance management - cyclical internal compliance audits and implementation of automatic tracking system for regulatory requirement changes with notifications for relevant departments; (4) Active participation in shaping regulatory environment - engagement in public consultations regarding new regulations, membership in industry organizations (including European Digital Finance Association, Blockchain for Europe); (5) Cooperation with specialized law firms in each key jurisdiction, ensuring constant access to local legal expertise and rapid response to regulatory changes; (6) Transparent regulatory communication - open dialogue with token holders and business partners about regulatory change implications.	
Sustainability Commitment	Environmental Risk

Billon DLT is one of the most energy-efficient blockchain platforms. Tests conducted within the European Blockchain Pre-Commercial Procurement (EBSI) project showed energy efficiency at 0.22 nanoWatt/h per transaction. Additionally, Billon Unified Ledger tests performed jointly with PwC showed that the solution is "60% more energy-efficient and 2.5x faster than enterprise Ethereum". We use only energy-efficient consensus mechanisms, regularly assess environmental impact of supported blockchains, and invest in ecological blockchain innovations.

Mitigation of Token-Related Risks

Mitigation Measure	Related Risks
Financial Stability Safeguards and Fund Protection	Collateralization Integrity Risk
EMT token value changes proportionally to base currency value, in which we maintain 100% of funds required to cover tokens in circulation value. StableCoin EMT is fully backed by equivalent funds denominated in base currency, ensuring full coverage of all issued tokens in accordance with regulatory requirements for Electronic Money Institutions.	
Liquidity Provision	Liquidity Constraint Risk
We have implemented a comprehensive liquidity provision system minimizing risk of redemption delays even under extreme market instability conditions: (1) Structured Redemption Plan - detailed operational procedures defining processes, schedules, and redemption execution priorities in various market scenarios, ensuring compliance with Article 55 of MiCA regulation; (2) Multi-level liquidity structure compliant with MiCA requirements: a) minimum 30% of reserves maintained as direct bank deposits with immediate access, b) remainder invested only in highest liquidity instruments with rapid liquidation capability (typically T+0 or T+1); (3) Continuous liquidity indicator monitoring - automatic supervision system measuring key parameters such as immediately available assets ratio to average redemption volume, with alarm thresholds anticipating potential problems; (4) Liquidity source diversification - cooperation with multiple financial institutions, eliminating dependence on single liquidity provider; (5) Extreme condition simulations - regular stress tests considering extreme redemption scenarios (up to 70% of tokens in circulation value within 24h) to verify procedures and optimize processes; (6) Redemption process automation - advanced technological solutions ensuring rapid verification and processing of redemption requests, minimizing operational delays; (7) Transparent redemption communication - clearly defined and publicly available redemption conditions, including execution terms and possible daily limits; (8) Liquidity buffer - maintaining additional liquidity reserves above regulatory minimum as protection against unforeseen redemption demand spikes; (9) Procedural backup - alternative redemption paths in case of primary payment channel failures. Thanks to these advanced mechanisms, token holders can be assured their redemption requests will be executed efficiently and timely, according to agreed conditions, regardless of market conditions, constituting a key element of trust in StableCoin EMT.	
Fraud Threat Education	External Fraud Risk

We will implement an educational program increasing user awareness in cybersecurity: (1) Regular information materials - we will publish current information about most common fraud types in crypto-asset sector, including phishing attacks and cases of StableCoin EMT brand impersonation; (2) Security Center - we will create a dedicated website section with advice on safe token use; (3) Security alert system - we will send notifications about detected fraud attempts and new attack vectors, with specific guidance on recognition; (4) Partner cooperation - we will collaborate with crypto-asset exchanges and other market participants to spread security knowledge; (5) Threat reporting channel - we will provide a simple way to report suspicious activities. Through systematic education, we will actively minimize fraud risk for StableCoin EMT holders.

Technical Safeguards

Mitigation Measure	Related Risks
Blockchain Security Measures	Blockchain Infrastructure Risk
Stabillon has implemented a multi-layered security system for supported blockchain platforms including key elements: Multi-chain architecture - StableCoin EMT operates in parallel on at least two independent blockchain platforms (initially Billon Unified DLT and Ethereum), ensuring system redundancy and resilience to single platform problems. Continuous network monitoring - 24/7 supervision is conducted over all supported blockchains, with alert system for abnormal transaction patterns, network anomalies, and potential attacks. Integration on public blockchains already technologically verified by other solutions, minimizing risk of unforeseen technical problems. Cooperation with leading blockchain security companies - Stabillon uses independent security audits and penetration tests for all StableCoin EMT implementations in its operations. At the time of application submission to the Financial Supervision Authority, Stabillon concludes an agreement for security audit, which along with potential re-audit will be completed before emission begins.	
Smart Contract Protection Framework	Smart Contract Vulnerability Risk
We will implement rigorous smart contract management protocols including: (1) Multi-layer security audits - each smart contract undergoes independent security audits conducted by recognized blockchain security firms before deployment; (2) Structured update process - all smart contract modifications are subject to formal proposal and approval process with multiple checkpoints; (3) Multi-level governance system - including Proposers, Governance Guardians, and token holder veto mechanism, preventing unilateral changes and ensuring transparency; (4) Update timelocks - all significant changes are subject to mandatory waiting periods, giving system participants time for analysis and reaction; (5) Public source code availability - all smart contracts are publicly verifiable, increasing security through possibility of independent community audits; (6) Mandatory re-audits after modifications - each smart contract code change requires full security audit before deployment.	

Transaction Irreversibility Education	Transaction Irreversibility Risk
We will conduct continuous educational activities regarding irreversible nature of blockchain transactions: (1) Clear information messages - before each transaction, users will receive clear warnings about operation irreversibility; (2) Safe transaction guides - we will provide detailed guidelines for safe transaction execution, including address verification before transfer and using test transactions with small amounts; (3) Educational materials - we will regularly update information about best practices and potential threats related to blockchain transaction irreversibility; (4) User support - we will provide help channels where users can receive guidance before conducting significant transactions. These activities aim to minimize error risk during transaction execution and increase user awareness of such error consequences.	

G – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
G.1	Adverse impacts on climate and other environment-related adverse impacts	Stabillon European EMTs implementation in the ERC-20 standard leverages the latest achievements in Ethereum's sustainability. After Ethereum's transition to Proof of Stake through "The Merge" in 2022, the network's energy consumption dropped by approximately 99.95%, making Ethereum-based tokens significantly more environmentally friendly. Stabillon European EMTs benefits from this significant improvement while maintaining full compatibility with the extensive Ethereum ecosystem. Additionally, the implementation optimizes gas usage through efficient Smart Contract construction and, where necessary, utilizes batching techniques to further reduce the environmental footprint per transaction. As Ethereum continues to improve its scalability through Layer 2 solutions and sharding, Billon Unified Blockchain is positioned to become even more energy-efficient while maintaining the security and interoperability of the Ethereum network. This dual blockchain platform approach allows Stabillon European EMTs to offer both the efficiency of its proprietary blockchain platform. The sustainability benefits of using Billon Unified Blockchain extend beyond just energy consumption: • **Advanced consensus mechanism**: Billon Unified Blockchain DLT supports multiple consensus mechanisms (the consensus model is established at the level of so-called Operating Groups and configured by the Supervisory Node), but primarily uses a specialized form of Proof of Stake (PoS) for Minting nodes (handling both digital assets and Electronic Money) and Publisher nodes (managing documents and data), eliminating the energy-intensive mining operations associated with Proof of Work systems. • **Optimized network design**: The Billon Unified Blockchain system architecture was designed with an emphasis on sustainability. The

		platform balances security with resource consumption, ensuring data integrity while minimizing environmental impact. More information about conducted tests can be found on the website or in the dedicated and audited test results report.

Table 1: Sustainability impact of Stabillon European EMT operated on Billon Unified Blockchain.

Type	Adverse Sustainability Indicator	Metric
Energy	Energy consumption	Billon Unified DLT's energy-efficient architecture, confirmed by EBSI testing during Pre Commercial Procurement project to consume only 0.23 nWh per transaction which is significantly less than traditional.

Signed by / Podpisano przez:

Andrzej Horoszczak

Date / Data: 2025-09-04 19:14

Signed by / Podpisano przez:

Robert Kałuża

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