Project name (Ticker)
White paper

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

N	Field	Content	Format (DELETE)
0	Table of content		Alphanumerical text

		J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts **29** **J.1** **29** Adverse impacts on climate and other environment-related adverse impacts 29	
01	Date of notification	Date of notification	2025-10-15
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The operator of the trading platform of the crypto-asset is solely responsible for the content of this crypto-asset white paper.	Predefined alphanumerical text
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.	Predefined alphanumerical text
04	Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114	The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.	Predefined alphanumerical text
05	Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	‘The utility token referred to in this white paper may not be exchangeable against the good or service promised in the crypto-asset white paper, especially in the case of a failure or discontinuation of the crypto-asset project.’	‘true’ – Yes

06	Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.	Predefined alphanumerical text
Summary			
07	Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	**Warning** This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The admission to trading of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to Union or national law.	Predefined alphanumerical text
08	Characteristics of the crypto-asset	A brief, clear and non-technical description of the characteristics of the crypto-asset including information about rights and obligations of the purchaser, procedure and conditions for the exercise of those rights, conditions, if any, under which these rights and obligations may be modified.	With a total of 100 million tokens, NEO has two main features: NEO holders participate in governance by voting for the Neo Committee, composed of members and consensus nodes that govern the Neo blockchain. The Neo Committee provides specific services, such as maintaining the liveliness of the network and

			adjusting critical blockchain parameters. 100 million NEO were generated at genesis. The release schedule can be found in the Neo White Paper.
09	Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability	Only applicable if field 05 is true. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability.	NEO holders participate in governance by voting for the Neo Committee, composed of members and consensus nodes that govern the Neo blockchain. The Neo Committee provides specific services, such as maintaining the liveliness of the network and adjusting critical blockchain parameters.
10	Key information about the offer to the public or admission to trading	A brief and non-technical description of the offer to the public including information about the amount of the offer, including, where applicable, any minimum and maximum target subscription goals, issue price of the crypto-asset and subscription fees, the total number of crypto-assets to be offered; prospective holders; description, where applicable, of the various phases of the offer to the public of crypto-assets, including information on discounted purchase price for early purchasers of cryptoassets, subscription period. When applicable, the name of the crypto-asset service provider in charge of the placing of crypto-assets and the form of such placement (with or without a firm commitment basis); When applicable, a brief and nontechnical description of the admission to trading, including the name of the trading platform for which the admission is sought.	Neo Global Development Ltd is seeking admission to trading on any Crypto Asset Service Provider platform in the European Union in accordance to Article 5 of REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 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. In accordance to Article 5(4), this crypto-asset white paper may be used by entities admitting the token to trading after Neo Global Development Ltd as the person responsible for drawing up such white paper has given its consent to its use in writing to the respective Crypto Asset Service Provider.

Part I – Information on risks			
I.1	Offer-Related Risks	A description of the risks associated with the offer to the public of cryptoassets or their admission to trading	1. Regulatory and Compliance This white paper (drawn up from 2025-10-01-2025-10-17) has been prepared with utmost caution; however, uncertainties in the regulatory requirements and future changes in regulatory frameworks could potentially impact the token's legal status and its tradability. There is also a high probability that other laws will come into force, changing the rules for the trading of the token. Therefore, such developments shall be monitored and acted upon accordingly. 2. Operational and Technical Blockchain Dependency: The token is entirely dependent on the blockchain the crypto asset is issued upon. Any issues, such as downtime, congestion, or security vulnerabilities within the blockchain, could adversely affect the token's functionality. Smart Contract Risks: Smart contracts governing the token may contain hidden vulnerabilities or bugs that could disrupt the token offering or distribution processes. Connection Dependency: As the trading of the token also involves other trading venues, technical risks such as downtime of the connection or faulty code are also possible. Human errors: Due to the irrevocability of blockchain-

			transactions, approving wrong transactions or using incorrect networks/addresses will most likely result in funds not being accessible anymore. Custodial risk: When admitting the token to trading, the risk of losing clients' assets due to hacks or other malicious acts is given. This is due to the fact the token is held in custodial wallets for the customers. 3. Market and Liquidity Volatility: The token will most likely be subject to high volatility and market speculation. Price fluctuations could be significant, posing a risk of substantial losses to holders. Liquidity Risk: Liquidity is contingent upon trading activity levels on decentralized exchanges (DEXs) and potentially on centralized exchanges (CEXs), should they be involved. Low trading volumes may restrict the buying and selling capabilities of the tokens. 4. Counterparty As the admission to trading involves the connection to other trading venues, counterparty risks arise. These include, but are not limited to, the following risks: General Trading Platform Risk: The risk of trading platforms not operating to the highest standards is given. Examples like FTX show that especially in nascent industries, compliance and oversight-frameworks might not be fully

			established and/or enforced. Listing or Delisting Risks: The listing or delisting of the token is subject to the trading partner's internal processes. Delisting the token at the connected trading partners could harm or completely halt the ability to trade the token. 5. Liquidity Liquidity of the token can vary, especially when trading activity is limited. This could result in high slippage when trading a token. 6. Failure of one or more Counterparties Another risk stems from the internal operational processes of the counterparties used. As there is no specific oversight other than the typical due diligence check, it cannot be guaranteed that all counterparties adhere to the best market standards. Bankruptcy Risk: Counterparties could go bankrupt, possibly resulting in a total loss for the clients' assets held at that counterparty.
I.2	Issuer-Related Risks	A description of the risks associated with the issuer, including risks related to the issuer's financial situation, business activities and related sector, legal and regulatory risk, internal control risk, governance risks	1. Insolvency As with every other commercial endeavor, the risk of insolvency of the issuer is given. This could be caused by but is not limited to lack of interest from the public, lack of funding, incapacitation of key developers and project members, force majeure (including

			pandemics and wars) or lack of commercial success or prospects. 2. Counterparty In order to operate, the issuer has most likely engaged in different business relationships with one or more third parties on which it strongly depends on. Loss or changes in the leadership or key partners of the issuer and/or the respective counterparties can lead to disruptions, loss of trust, or project failure. This could result in a total loss of economic value for the crypto-asset holders. 3. Legal and Regulatory Compliance Cryptocurrencies and blockchain-based technologies are subject to evolving regulatory landscapes worldwide. Regulations vary across jurisdictions and may be subject to significant changes. Non-compliance can result in investigations, enforcement actions, penalties, fines, sanctions, or the prohibition of the trading of the crypto-asset impacting its viability and market acceptance. This could also result in the issuer to be subject to private litigation. The beforementioned would most likely also lead to changes with respect to trading of the crypto-asset that may negatively impact the value, legality, or functionality of the crypto-asset. 4. Operational Failure to develop or maintain effective internal control, or any difficulties encountered in the implementation of such controls, or

			their improvement could harm the issuer's business, causing disruptions, financial losses, or reputational damage. 5. Industry The issuer operates within the blockchain and digital asset industry, which is characterized by rapid technological evolution, high volatility, and intense competition. This sector is still relatively nascent and subject to significant uncertainty regarding long-term adoption, scalability, and interoperability. 6. Reputational The issuer faces the risk of negative publicity, whether due to, without limitation, operational failures, security breaches, or association with illicit activities, which can damage the issuer’s reputation and, by extension, the value and acceptance of the crypto-asset. 7. Competition There are numerous other crypto-asset projects in the same realm, which could have an effect on the crypto-asset in question. 8. Unanticipated Risk In addition to the risks included in this section, there might be other risks that cannot be foreseen. Additional risks may also materialize as unanticipated variations or combinations of the risks discussed.

I.3	Crypto-Assets-related Risks	A description of the risks associated with the crypto-assets	1. Valuation The mechanism to determine the price are its intrinsic value, supply and demand. Historically, most crypto-assets have dramatically lost value and were not a beneficial investment for the investors. Therefore, investing in these crypto-assets poses a risk, and the loss of funds can occur. 2. Market Volatility Crypto-asset prices are highly susceptible to dramatic fluctuations influence by various factors, including market sentiment, regulatory changes, technological advancements, and macroeconomic conditions. These fluctuations can result in significant financial losses within short periods, making the market highly unpredictable and challenging for investors. 3. Liquidity Challenges Some crypto-assets suffer from limited liquidity, which can present difficulties when executing large trades without significantly impacting market prices. This lack of liquidity can lead to substantial financial losses, particularly during periods of rapid market movements, when selling assets may become challenging or require accepting unfavorable prices. 4. Asset Security Crypto-assets face unique security threats, including the risk of theft from exchanges or digital wallets,

			loss of private keys, and potential failures of custodial services. Since crypto transactions are generally irreversible, a security breach or mismanagement can result in the permanent loss of assets, emphasizing the importance of strong security measures and practices. 5. Scams The irrevocability of transactions executed using blockchain infrastructure, as well as the pseudonymous nature of blockchain ecosystems, attracts scammers. Therefore, investors in crypto-assets must proceed with a high degree of caution when investing in if they invest in crypto-assets. Typical scams include – but are not limited to – the creation of fake crypto-assets with the same name, phishing on social networks or by email, fake giveaways/airdrops, identity theft, among others. 6. Blockchain Dependency Any issues with the blockchain used, such as network downtime, congestion, or security vulnerabilities, could disrupt the transfer, trading, or functionality of the crypto-asset. 7. Smart Contract Vulnerabilities The smart contract used to issue the crypto-asset could include bugs, coding errors, or vulnerabilities which could be exploited by malicious actors, potentially leading to asset loss, unauthorized data access, or unintended operational consequences.

			8. Privacy Concerns All transactions on the blockchain are permanently recorded and publicly accessible, which can potentially expose user activities. Although addresses are pseudonymous, the transparent and immutable nature of blockchain allows for advanced forensic analysis and intelligence gathering. This level of transparency can make it possible to link blockchain addresses to real-world identities over time, compromising user privacy. 9. Regulatory Uncertainty The regulatory environment surrounding crypto-assets is constantly evolving, which can directly impact their usage, valuation, and legal status. Changes in regulatory frameworks may introduce new requirements related to consumer protection, taxation, and anti-money laundering compliance, creating uncertainty and potential challenges for investors and businesses operating in the crypto space. Although the crypto-asset do not create or confer any contractual or other obligations on any party, certain regulators may nevertheless qualify the crypto-asset as a security or other financial instrument under their applicable law, which in turn would have drastic consequences for the crypto-asset, including the potential loss of the invested capital in the asset. Furthermore, this could lead to the sellers and its affiliates, directors, and officers being obliged to pay

			fines, including federal civil and criminal penalties, or make the cryptoasset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the issuer as well as the trading platforms if the the regulators view the token as an unregistered offering of securities or the operations otherwise as a violation of existing law. Any of these outcomes would negatively affect the value and/or functionality of the crypto-asset and/or could cause a complete loss of funds of the invested money in the crypto-asset for the investor. 10. Counterparty risk Engaging in agreements or storing crypto-assets on exchanges introduces counterparty risks, including the failure of the other party to fulfill their obligations. Investors may face potential losses due to factors such as insolvency, regulatory non-compliance, or fraudulent activities by counterparties, highlighting the need for careful due diligence when engaging with third parties. 11. Reputational concerns Crypto-assets are often subject to reputational risks stemming from associations with illegal activities, high-profile security breaches, and technological failures. Such incidents can undermine trust in the broader ecosystem, negatively affecting investor confidence and market value, thereby hindering widespread adoption and

			acceptance. 12. Technological Innovation New technologies or platforms could render Neo's design less competitive or even break fundamental parts (i.e., quantum computing might break cryptographic algorithms used to secure the network), impacting adoption and value. Participants should approach the crypto-asset with a clear understanding of its speculative and volatile nature and be prepared to accept these risks and bear potential losses, which could include the complete loss of the asset's value. 13. Community and Narrative Trading activity is based on the intended market value is heavily dependent on its community and the popularity of the narrative. Declining interest or negative sentiment could significantly impact the token’s value. 14. Interest Rate Change Historically, changes in interest, foreign exchange rates, and increases in volatility have increased credit and market risks and may also affect the value of the crypto-asset. Although historic data does not predict the future, potential investors should be aware that general movements in local and other factors may affect the market, and this could also affect market sentiment and, therefore most likely also the price of the cryptoasset. 15. Taxation

			The taxation regime that applies to the trading of the crypto-asset by individual holders or legal entities will depend on the holder's jurisdiction. It is the holder's sole responsibility to comply with all applicable tax laws, including, but not limited to, the reporting and payment of income tax, wealth tax, or similar taxes arising in connection with the appreciation and depreciation of the crypto-asset. 16. Anti-Money Laundering/Counter-Terrorism Financing. It cannot be ruled out that crypto-asset wallet addresses interacting with the cryptoasset have been, or will be used for money laundering or terrorist financing purposes, or are identified with a person known to have committed such offenses. 17. Market Abuse It is noteworthy that crypto-assets are potentially prone to increased market abuse risks, as the underlying infrastructure could be used to exploit arbitrage opportunities through schemes such as front-running, spoofing, pump-and-dump, and fraud across different systems, platforms, or geographic locations. This is especially true for cryptoassets with a low market capitalization and few trading venues, and potential investors should be aware that this could lead to a total loss of the funds invested in the cryptoasset. 18. Timeline and Milestones Critical project milestones could be delayed by technical, operational, or

			market challenges.
I.4	Project Implementation-Related Risks	A description of the risks associated with project implementation	As this white paper relates to the "Admission to trading" of the crypto-asset, the implementation risk is referring to the risks on the Crypto Asset Service Providers side. These can be, but are not limited to, typical project management risks, such as key personal-risks, timeline-risks, and technical implementation-risks.
I.5	Technology-Related Risks	A description of the risks associated with the technology used	1. Smart Contract Risks Vulnerabilities: The smart contract governing the token could contain bugs or vulnerabilities that may be exploited, affecting token distribution or vesting schedules. 2. Wallet and Storage Risks Private Key Management: Token holders must securely manage their private keys and recovery phrases to prevent permanent loss of access to their tokens, which includes Trading-Venues, who are a prominent target for dedicated hacks. Compatibility Issues: The tokens require wallets for storage and transfer. Any incompatibility or technical issues with these wallets could impact token accessibility.
I.6	Mitigation measures	Mitigation measures of the risks associated with the technology, if any	Not applicable.

Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Name	Neo Global Development Ltd
A.2	Legal form	Only applicable if an LEI is not provided in field A.6. Legal form	BVI Ltd
A.3	Registered address	Only applicable if an LEI is not provided in field A.6. Address and country of registration	Craigmuir Chambers, Road Town, Tortola, VG 1110, British Virgin Islands
A.4	Head office	Only applicable if an LEI is not provided in field A.6. Address and country of the Head office, where different than registered address	Entrepreneurship Centre, Level 5, Cyberport 3 (Core F),100 Cyberport Road, Hong Kong, China
A.5	Registration Date	Date of the registration	2018-12-20
A.6	Legal entity identifier	Legal entity identifier of the offeror or person seeking admission to trading	Not applicable.
A.7	Another identifier required pursuant to applicable national law	National identifier based on the nationality of the offeror or the person seeking admission to trading, if required under the applicable national law. This field only applies to entities for which a national identifier is required in accordance with applicable national law.	Not Applicable
A.8	Contact telephone number	Contact telephone number of the offeror or the person seeking admission to trading	+65 89426384
A.9	E-mail address	E-mail address of the offeror or the person seeking admission to trading	wangjiachao@ngd.neo.org
A.10	Response Time (Days)	Period of days within which an investor will receive an answer via that telephone number or email address	030

A.11	Parent Company	Field to be filled in only if an LEI is not provided in field A.6. Where applicable, the name of the parent company	Not applicable.
A.12	Members of the Management body	Identity, business address and functions of each person that is member of the management body, as defined in Article 3(1) point (27) of Regulation (EU) 2023/1114, of the offeror or the person seeking admission to trading.	Identity: Da Hongfei Business Address: Entrepreneurship Centre, Level 5, Cyberport 3 (Core F),100 Cyberport Road, Hong Kong, China Function: Director
A.13	Business Activity	Business or professional activity of the offeror or person seeking admission to trading, including principal activities and principal markets	Development of software and programming activities Neo is an open-source community driven blockchain platform. It is the most feature-complete blockchain platform for building decentralized applications. Neo enables developers to digitize and automate the management of assets through smart contracts. It also provides powerful native infrastructures such as decentralized storage, oracles, and domain name service, creating a solid foundation for the Next-Gen Internet.
A.14	Parent Company Business Activity	Where applicable, business or professional activity of the parent company, including principal activities and principal markets	Not applicable.
A.15	Newly Established	Indication as to whether the offeror or person seeking admission to trading has been established for the past three years	'false' – No
A.16	Financial condition for the past three years	Where the offeror or person seeking admission to trading has been established for the past three years, the financial condition of the offeror or person seeking admission to trading over the past three years. This shall be assessed based on a fair review of the development and	Neo Global Development, the operational arm of Neo Foundation, maintains its financial base through funding from Neo Foundation, and a stable equity position in 2023. The company has managed consistent financial performance over the past three years, with annual

		performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is required, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business. The analysis shall include both financial and, where appropriate, non-financial Key Performance Indicators relevant to the business. The analysis shall, where appropriate, include references to, and additional explanations of, amounts reported in the annual financial statements (where available), information regarding unusual or infrequent events or new developments, materially affecting the income from operations and indicate the extent to which income was so affected, information concerning capital resources (both short term and long term) and an explanation of the sources and amounts of and a narrative description of the cash flows.	expenditures ranging from $2 million to $3 million USD, supporting a workforce of approximately 40 employees. Despite market fluctuations in the blockchain sector, Neo Global Development has remained financially stable, covering operational costs through Neo Foundation funding. In 2023 and 2024, Neo Global Development optimized its operational efficiency, expanded its blockchain development initiatives, and maintained a steady financial position. Looking ahead to 2025, the company expects continued stability, supported by ongoing funding from Neo Foundation, increased adoption of Neo blockchain technologies, and growth in its ecosystem, driving sustainable operations within the $2 million to $3 million USD annual expenditure range.
A.17	Financial condition since registration	Where the offeror or person seeking admission to trading has not been established for the past three years, description of its financial condition since the date of its registration. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is available, including the	Neo Global Development has been financially stable since its registration, backed by funding from Neo Foundation. Since inception, the company has grown its operations, employing around 40 staff, and established itself as a key operational entity for Neo Foundation in advancing the Neo blockchain ecosystem. Despite varying market conditions, Neo Global Development has maintained

		causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business. The analysis shall include both financial and, where appropriate, non - financial Key Performance Indicators relevant to the particular business. The analysis shall, where appropriate, include references to, and additional explanations of, amounts reported in the annual financial statements (when available), information regarding unusual or infrequent events or new developments, materially affecting the income from operations and indicate the extent to which income was so affected, information concerning capital resources (both short term and long term) and an explanation of the sources and amounts of and a narrative description of the cash flows.	break-even operations, with annual spending consistently between $2 million and $3 million USD. The company has reinvested in its blockchain infrastructure, developer support, and team development, ensuring long-term sustainability. Looking ahead, Neo Global Development anticipates continued financial stability, driven by Neo Foundation support and the expanding adoption of Neo technologies.
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading			
B.1	Issuer different from offeror or person seeking admission to trading	Indication as to whether the issuer is different from the offeror or person seeking admission to trading	Not applicable.
B.2	Name	Entity behind the project	Not applicable.
B.3	Legal form	Field to be filled in only if an LEI is not provided in field B.7. Legal form	Not applicable.

<table>
<tr><td>B.4</td><td>Registered address</td><td>Field to be filled in only if an LEI is not provided in field B.7. Address and country of registration</td><td>Not applicable.</td></tr>
<tr><td>B.5</td><td>Head office</td><td>Field to be filled in only if an LEI is not provided in field B.7.

Address of the Head office, where different than registered address</td><td>Not applicable.</td></tr>
<tr><td>B.6</td><td>Registration Date</td><td>Date of the registration</td><td>Not applicable.</td></tr>
<tr><td>B.7</td><td>Legal entity identifier</td><td>Legal entity identifier of the issuer</td><td>Not applicable.</td></tr>
<tr><td>B.8</td><td>Another identifier required pursuant to applicable national law</td><td>National identifier based on the nationality of the issuer, if required under the applicable national law.

This field only applies to entities for which a national identifier exists under applicable national law.</td><td>Not applicable.</td></tr>
<tr><td>B.9</td><td>Parent Company</td><td>Field to be filled in only if an LEI is not provided in field B.7. Where applicable, the name of the parent company</td><td>Not applicable.</td></tr>
<tr><td>B.10</td><td>Members of the Management body</td><td>Identity, business address and functions of each of the persons that are members of the management body, as defined in Article 3(1) point (27) of Regulation (EU) 2023/1114, of the issuer.

<table><tr><th>Full Name</th><th>Business Address</th><th>Function</th></tr><tr><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr></table></td><td>Not applicable.</td></tr>
<tr><td>B.11</td><td>Business Activity</td><td>Business or professional activity of the issuer, including principal activities, principal markets and recent financial condition.</td><td>Not applicable.</td></tr>
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B.12	Parent Company Business Activity	Where applicable, business or professional activity of the parent company, including principal activities and principal markets.	Not applicable.
Part C- Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114			
C.1	Name	Name	Not applicable.
C.2	Legal form	Field to be filled in only if an LEI is not provided in field C.6. Legal form	Not applicable.
C.3	Registered address	Field to be filled in only if an LEI is not provided in field C.6. Address of registration	Not applicable.
C.4	Head office	Field to be filled in only if an LEI is not provided in field C.6. Address of the Head office, where different than registered address	Not applicable.
C.5	Registration Date	Date of the registration	Not applicable.
C.6	Legal entity identifier of the operator of the trading platform	Legal entity identifier of the operator of the trading platform	Not applicable.
C.7	Another identifier required pursuant to applicable national law	National identifier based on the nationality of the issuer, if required under the applicable national law. This field only applies to entities for which a national identifier is required under applicable national law.	Not applicable.
C.8	Parent Company	Field to be filled in only if an LEI is not provided in field C.6. Where applicable, the name of the parent company	Not applicable.

C.9	Reason for Crypto-Asset White Paper Preparation	The reason why the operator of the trading platform drew up the cryptoasset white paper	Not applicable.
C.10	Members of the Management body	Identity (name or other identifiers), business address and functions of each of the persons that are members of the management body, as defined in Article 3(1) point (27) of Regulation (EU) 2023/1114, of the operator of the trading platform.	Not applicable.
C.11	Operator Business Activity	Business or professional activity of the operator, including principal activities and principal markets.	Not applicable.
C.12	Parent Company Business Activity	Where applicable, business or professional activity of the parent company, including principal activities and principal markets	Not applicable.
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Where different from the offeror, person seeking admission to trading, issuer, operator of the trading platform, indication of the identity of the person drawing up the cryptoasset white paper	Not applicable.
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Where the white paper is drawn up by a person different from the offeror, person seeking admission to trading, issuer, operator of the trading platform, reason for drawing up the white paper	Not applicable.

Part D- Information about the crypto-asset project			
D.1	Crypto-asset project name	Name of the crypto-asset project, if different from the name of the offeror or person seeking admission to trading	Neo Smart Economy
D.2	Crypto-assets name	Field to be filled in only if a DTI is not provided in field F.14. Name of the crypto-assets, if different from the name of the offeror or person seeking admission to trading	Neo Token
D.3	Abbreviation	Field to be filled in only if a DTI is not provided in field F.14. Abbreviation or ticker handler	NEO
D.4	Crypto-asset project description	A brief description of the crypto-asset project	Neo is the most feature-complete blockchain platform for building decentralized applications. Free alphanumerical text
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Details of advisors, development team, crypto-assets service providers and other persons involved in the implementation of the crypto-asset project, including business addresses or domicile of the company	The Neo Global Development Ltd is responsible for setting the strategic direction for the Neo project and distributing funding to various groups for execution. Led by project founder Da Hongfei, the Neo Global Development Ltd primarily liaises with Neo Global Development, sponsored communities, and core developers. Core Developers are a highly skilled and dedicated team of subject matter experts responsible for advancing Neo's core protocol. Anyone can contribute to the Neo codebase, however core developers have the permissions to review and merge pull requests. Developers who consistently provide high quality contributions to the Neo project may become eligible for an invite to the core group.

			Neo Global Development Ltd. can be considered as the main execution arm of the Neo Global Development Ltd. It is responsible for tasks such as business development, marketing, events management, and direct technical support to partner organizations. Sponsored Community Groups - Neo has sponsored various self-governed communities around the world to help build out Neo's developer tools and infrastructure. The communities also provide support to new developers joining the ecosystem and provide outreach and learning opportunities to local groups in their various regions. The groups include COZ, NeoResearch, NSPCC, Next, AxLabs, Red4Sec, Neo News Today, R3E Free alphanumerical text presented in a tabular format
D.6	Utility Token Classification	Indication as to whether the cryptoasset project concerns utility tokens	'true' – Yes
D.7	Key Features of Goods/Services for Utility Token Projects	Where applicable, key features of the goods or services to be developed for utility tokens crypto-asset projects	Neo implements a dual-token economic model consisting of NEO and GAS tokens. NEO serves as the governance token with a fixed supply of 100 million tokens. NEO holders can participate in network governance, including voting for consensus nodes and network parameter modifications.
D.8	Plans for the token	Information about the crypto-asset project, including the description of the past and future milestones	Neo was founded by Da Hongfei and Erik Zhang in 2014 under the name Antshares. The original source code was published to

			GitHub in July 2015 and the MainNet subsequently launched in October 2016. In 2017, Antshares was rebranded to Neo as it implemented Smart Contracts 2.0. It underwent aggressive global expansion as hundreds of new developers poured onto the blockchain. Neo leadership began distributing NEO token rewards to groups and individuals that contributed to the growth of the Neo platform. Some of the earliest groups to join Neo included COZ, NeoEconoLabs, and O3 Labs. In 2021, Neo was upgraded to version 3.0, known as N3. It brought the first all-in-one blockchain development experience to the industry, packed with powerful native features such as distributed storage NeoFS, oracles, and name services. Neo N3 also boasts a simpler and more modular architecture than its predecessors, along with an improved governance and economic model. Later, Neo delivered Flamingo Finance—one of the biggest and most innovative DEXs on the market—and a diversified dApp ecosystem overall. In 2024, Neo soft-launched Neo X, its EVM sidechain, and is planning a massive marketing campaign to build out the DeFi ecosystem there. In 2025, Neo announced SpoonOS, an agentic operating system designed to support AI agents in decentralized environments.

D.9	Resource Allocation	Where applicable, information about resources, including financial resources, already allocated to the project	Not applicable.
D.10	Planned Use of Collected Funds or Crypto-Assets	Where applicable, planned use of any funds or other crypto-assets collected	Not applicable.
Part E - Information about the offer to the public of crypto-assets or their admission to trading			
E.1	Public Offering or Admission to trading	Indication as to whether the cryptoasset white paper concerns an offer to the public of crypto-assets or their admission to trading	'ATTR' - admission to trading
E.2	Reasons for Public Offer or Admission to trading	The reasons for the offer to the public or for seeking admission to trading, including what is the intended use of the funds raised with the offer	Scaling Neo X: Expanding infrastructure and developer support for Neo X, our EVM-compatible sidechain, with a focus on onboarding DeFi protocols and launching a global marketing campaign to drive adoption. Advancing SpoonOS: Investing in the development and deployment of SpoonOS, Neo's agentic operating system, to enable AI-native dApps and autonomous agents in decentralized environments. Ecosystem Growth: Funding grants, hackathons, and strategic partnerships to attract builders and innovators to the Neo N3 and Neo X platforms, reinforcing its position as a leading smart contract and dApp ecosystem. Global Outreach: Enhancing community engagement through marketing and developer education across key regions.

			Free alphanumerical text
E.3	Fundraising Target	Where applicable, the amount that the offer to the public intends to raise in funds or in any other cryptoasset in an official currency or any other crypto-assets	Not applicable.
E.4	Minimum Subscription Goals	Where applicable, any minimum target subscription goals set for the offer to the public of the crypto-assets in an official currency or any other crypto-assets	Not applicable.
E.5	Maximum Subscription Goal	Where applicable, any maximum target subscription goals set for the offer to the public of the crypto-assets in an official currency or any other crypto-assets	Not applicable.
E.6	Oversubscription Acceptance	Indication whether oversubscriptions are accepted	Not applicable.
E.7	Oversubscription Allocation	Where oversubscriptions are accepted, how they are allocated	Not applicable.
E.8	Issue Price	The issue price of the crypto-asset being offered to the public in an official currency or any other cryptoassets	Not applicable.
E.9	Official currency or other crypto-assets determining the issue price	The official currency or any other crypto-assets on the basis of which the issue price of the crypto asset is being offered to the public	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.10	Subscription fee	Any applicable subscription fee in an official currency or any other cryptoassets	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.11	Offer Price Determination Method	Method in accordance with which the offer price will be determined	Once the token is admitted to trading its price will be determined by demand (buyers) and supply (sellers).

E.12	Total Number of Offered/Traded crypto-assets	Where applicable, the total number of crypto-assets to be offered to the public or admitted to trading	100,000,000
E.13	Targeted Holders	Indication of the prospective holders targeted by the offer to the public of the crypto-asset or admission of such crypto-asset to trading	'ALL' – all types of investors
E.14	Holder restrictions	Indication of any restriction as regards the type of holders for such crypto-asset	The Holder restrictions are subject to the rules applicable to the Crypto Asset Service Provider as well as additional restrictions the Crypto Asset Service Providers might set in force.
E.15	Reimbursement Notice	'Purchasers participating in the offer to this public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal foreseen in Article 13 of Regulation (EU) 2023/1114 or if the offer is cancelled'	Not applicable.
E.16	Refund Mechanism	Detailed description of the refund mechanism	Not applicable.
E.17	Refund Timeline	Expected timeline of when such refunds will be completed	Not applicable.
E.18	Offer Phases	Information about the various phases of the offer to the public of the cryptoasset	Not applicable.
E.19	Early Purchase Discount	Information on discounted purchase price for early purchasers of the crypto-asset - (pre-public sales) and in the case of discounted purchase price for some purchasers, an explanation as to why the purchase prices may be different and a description of the impact on the other investors	Not applicable.

E.20	Time-limited offer	Indication whether the offer is timelimited	Not applicable.
E.21	Subscription period beginning	For time-limited offers, the beginning of the subscription period during which the offer to the public is open	Not applicable.
E.22	Subscription period end	For time-limited offers, the end of the subscription period during which the offer to the public is open	Not applicable.
E.23	Safeguarding Arrangements for Offered Funds/crypto-assets	The arrangements to safeguard funds or other crypto-assets as referred to in Article 10 of Regulation (EU) 2023/1114 during the time-limited offer to the public or during the withdrawal period	Not applicable.
E.24	Payment Methods for crypto-asset Purchase	Methods of payment to purchase the crypto-assets	The payment methods are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.
E.25	Value Transfer Methods for Reimbursement	Methods of transfer of the value to the purchasers when they are entitled to be reimbursed	Not applicable.
E.26	Right of Withdrawal	In the case of offers to the public (field E1), information on the right of withdrawal as referred to in Article 13 of Regulation (EU) 2023/1114	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.27	Transfer of Purchased crypto-assets	Manner of transferring purchased crypto-assets to the holders	The transfer of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.
E.28	Transfer Time Schedule	Time schedule of transferring purchased crypto-assets to the holders	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.29	Purchaser's Technical Requirements	Information about technical requirements that the purchaser is required to fulfil to hold the cryptoassets	The technical requirements that the purchaser is required to fulfil to hold the cryptoassets of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.
E.30	Crypto-asset service provider (CASP) name	Where applicable, the name of the crypto-asset service provider (CASP) in charge of the placing of cryptoassets	Payward Global Solutions LTD
E.31	CASP identifier	Where available, the legal entity identifier of the crypto-asset service provider in charge of the placing of crypto-assets	LEI: 9845003D98SCC2851458
E.32	Placement form	Where applicable, the form of such placement	NTAV
E.33	Trading Platforms name	Where applicable, the name of the trading platforms for crypto-assets where admission to trading is sought	Kraken
E.34	Trading Platforms Market Identifier Code (MIC)	Segment MIC for the trading platform where the admission to trading of the crypto-assets is sought.	MIC is PGSL
E.35	Trading Platforms Access	Where applicable, information about how investors can access such trading platforms	This depends on the trading platform listing the asset.
E.36	Involved costs	Where applicable, information about the costs involved in relation to the access of investors to the trading platforms	This depends on the trading platform listing the asset. Furthermore, costs may occur for making transfers out of the platform (i. e. "gas costs" for blockchain network use that may exceed the value of the crypto-asset itself).
E.37	Offer Expenses	Expenses related to the offer to the public of crypto-assets, in an official currency or any other crypto-assets	Not applicable, as this crypto-asset white paper concerns the admission to trading and not the offer of the

			token to the public.
E.38	Conflicts of Interest	Potential conflicts of interest of the persons involved in the offer to the public or admission to trading, arising in relation to the offer or admission to trading	MiCAR-compliant Crypto Asset Service Providers shall have strong measurements in place in order to manage conflicts of interests. Due to the broad audience this white-paper is addressing, potential investors should always check the conflicts of Interest policy of their respective counterparty.
E.39	Applicable law	The law applicable to the offer to the public of the crypto-asset	Not applicable, as it is referred to on "offer to the public" and in this white-paper, the admission to trading is sought.
E.40	Competent court	Competent court	Not applicable, as it is referred to on "offer to the public" and in this white-paper, the admission to trading is sought.
Part F - Information about the crypto-assets			
F.1	Crypto-Asset Type	The type of crypto-asset that will be offered to the public or for which admission to trading is sought	The crypto-asset described in the white paper is classified as a crypto-asset under the Markets in Crypto-Assets Regulation (MiCAR) but does not qualify as an electronic money token (EMT) or an asset-referenced token (ART). It is a digital representation of value that can be stored and transferred using distributed ledger technology (DLT) or similar technology, without embodying or conferring any rights to its holder. The asset does not aim to maintain a stable value by referencing an official currency, a basket of assets,

			or any other underlying rights. Instead, its valuation is entirely market driven, based on supply and demand dynamics, and not supported by a stabilization mechanism. It is neither pegged to any fiat currency nor backed by any external assets, distinguishing it clearly from EMTs and ARTs. Furthermore, the crypto-asset is not categorized as a financial instrument, deposit, insurance product, pension product, or any other regulated financial product under EU law. It does not grant financial rights, voting rights, or any contractual claims to its holders, ensuring that it remains outside the scope of regulatory frameworks applicable to traditional financial instruments.
F.2	Crypto-Asset Functionality	A description of the functionality of the crypto-assets being offered or admitted to trading	NEO NEO holders are the owners and managers of the Neo network. By constructing voting transactions on the Neo network, they can exercise management power, such as electing consensus nodes, adjusting consensus strategy and adjusting pricing model.
F.3	Planned Application of Functionalities	Information about when the functionalities of the crypto-assets being offered or admitted to trading are planned to apply	Voting functionality of NEO token is available already

A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article			
F.4	Type of crypto-asset white paper	The type of white paper notified.	OTHR
F.5	The type of submission	Type of submission	New
F.6	Crypto-Asset Characteristics	A description of the characteristics of the crypto-asset	Neo’s dual-token economic model—centered on NEO and GAS—is intentionally designed to place NEO at the heart of network governance, decision-making, and long-term value. While GAS serves as the utility layer for day-to-day operations, NEO is the non-negotiable "ownership token" that defines who shapes the blockchain’s direction, secures its infrastructure, and stewards its growth. Below is a detailed breakdown of NEO’s central role: 1. NEO’s Foundational Role: Separating Governance from Utility (to its advantage) The dual-token structure exists first and foremost to elevate NEO as the network’s governance authority. Unlike single-token models where one asset must juggle "voting" and "payment" duties (diluting both purposes), Neo’s design gives NEO exclusive control over strategic decisions—while GAS handles operational costs (e.g., transaction fees, smart contract deployment). This separation ensures NEO’s value is not tied to short-term operational demand (like fluctuating

			transaction volumes) but to its unique power to govern and secure the network. With a permanently fixed supply of 100 million tokens (no post-launch minting or burning), NEO’s scarcity further reinforces its role as a "stake in Neo’s future": every token represents a share of decision-making power, making holders direct custodians of the blockchain. 2. NEO Holders: The Exclusive Architects of Network Governance NEO is not just a token—it is a "voting passport" that grants holders sole authority to shape Neo’s core rules, infrastructure, and evolution. Its governance capabilities are far-reaching and non-delegable to any central entity: A. Securing the Network: Voting for Consensus Nodes Neo’s delegated Byzantine Fault Tolerance (dBFT) consensus mechanism—its engine for validating transactions and maintaining ledger integrity—depends entirely on NEO holders’ votes. Here’s how NEO drives this process: NEO holders stake their tokens to nominate "candidate nodes" (individuals or organizations that meet strict technical, security, and compliance standards). Only the top vote-getters (typically 21 nodes, a number adjustable via NEO governance) become active consensus nodes—entrusted with verifying transactions, producing blocks, and earning GAS rewards. This means NEO holders directly choose who safeguards the network: no central authority picks

			validators, ensuring decentralization and accountability. B. Shaping the Rules: Voting on Critical Network Parameters Neo’s ability to adapt to new technologies, user needs, or market conditions lies exclusively with NEO holders. They vote on make-or-break changes like: Transaction fee structures (e.g., setting minimum GAS required for smart contract execution to prevent spam). Consensus rules (e.g., modifying block generation times or the number of active consensus nodes). Protocol upgrades (e.g., activating support for new programming languages, integrating cross-chain tools, or launching layer-2 solutions). All votes require a minimum threshold of NEO participation to pass—ensuring decisions reflect the broader community’s interests, not just a small group of large holders. C. Stewarding the Ecosystem: Guiding Long-Term Growth NEO holders are more than voters—they are Neo’s "board of directors." Beyond technical decisions, they often weigh in on initiatives that determine the ecosystem’s success, such as: Allocating funds from Neo’s ecosystem reserves to support developer grants, security audits, or adoption campaigns (e.g., funding tools for DeFi or supply chain use cases). Approving partnerships or integrations that align with Neo’s strategic goals (e.g., collaborating with enterprise platforms to expand

			real-world utility). 3. Why NEO Is Irreplaceable to Neo's Success Every element of Neo's dual-token model is built to amplify NEO's role: Fixed Supply: Scarcity ensures NEO's governance power remains valuable and concentrated in the hands of long-term stakeholders (not speculators). No Utility Overlap: By letting GAS handle operational costs, NEO's value stays tied to governance—so its price reflects confidence in the network's direction, not short-term transaction spikes. Inclusivity: Even small NEO holders can vote (with voting weight proportional to their stake), ensuring no single group dominates decisions.
F.7	Commercial name or trading name	Field to be filled in only if a DTI is not provided in field F.14. Commercial name or trading name of the issuer.	Neo Token
F.8	Website of the issuer	Website of the issuer	Neo.org
F.9	Starting date of offer to the public or admission to trading	Starting date or, if not available, the intended starting date of offer to the public or admission to trading.	The intended starting date is 2025-11-01.
F.10	Publication date	Effective or intended publication date of the white paper or of the modified white paper. XYZ	The intended starting date is 2025-11-01.
F.11	Any other services provided by the issuer	Any other services provided by the issuer not covered by Regulation (EU) 2023/1114, with a reference to the applicable Union or national law.	The issuer of the token is a BVI-based entity and due to the lack of publicly available information and resources while drawing up this white paper it is not possible to

			exclude a possibility that the issuer of the token provides or will provide other services not covered by Regulation (EU) 2023/1114 (i.e. MiCAR).
F.12	Language or languages of the white paper	Language or languages in which the crypto-asset white paper is drafted. When multiple languages have been used, this field shall be reported as many times as necessary	English
F.13	Digital Token Identifier	Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	N2FWML4CL
F.14	Functionally Fungible Group Digital Token Identifier	Code used to uniquely identify the functionally fungible group to which the digital asset belongs (i.e., common to each of the several assets to which the white paper relates, i.e. Code used to identify the white paper ISO 24165 DTI of type = 3 (i.e., functionally fungible group), where available	N2FWML4CL
F.15	Voluntary data flag	Flag indicating the mandatory or voluntary nature of the white paper submitted in accordance with Article 4(8)	‘false’ – mandatory
F.16	Personal data flag	Flag indicating if the submitted white paper contains personal data	‘true’ – Yes
F.17	LEI eligibility	Indication that the issuer is eligible for a Legal Entity Identifier.	‘false’ – not eligible
F.18	Home Member State	Home member state as defined in Article 3 paragraph 33 of Regulation (EU) 2023/1114	Ireland
F.19	Host Member States	Host member state as defined in Article 3 paragraph 34 of Regulation (EU) 2023/1114.	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania,

			Slovakia, Slovenia, Spain, Sweden, Norway, Iceland, Liechtenstein
Part G - Information on the rights and obligations attached to the crypto-assets			
G.1	Purchaser Rights and Obligations	A description of the rights and obligations, if any, of the purchaser	NEO holders participate in governance by voting for the Neo Committee, composed of members and consensus nodes that govern the Neo blockchain.
G.2	Exercise of Rights and obligations	Procedure and conditions for the exercise of rights	Neo holders are able to exercise rights and obligations.
G.3	Conditions for modifications of rights and obligations	Description of the conditions under which the rights and obligations may be modified	The specific conditions for modifications of rights and obligations will be shown on official website.
G.4	Future Public Offers	Where applicable, information on future offers to the public of crypto-assets by the issuer	Information on the future offers to the public of crypto-assets were not available at the time of writing this white paper.
G.5	Issuer Retained Crypto-Assets	Where applicable, information on the number of crypto-assets retained by the issuer itself	Not applicable.
G.6	Utility Token Classification	Indication as to whether the offer to the public of crypto-assets or their admission to trading concerns utility tokens	'true' – Yes
G.7	Key Features of Goods/Services of Utility Tokens	Information about the quality and quantity of goods or services to which the utility tokens give access	With a total of 100 million tokens, NEO has two main features: NEO holders participate in governance by voting for the Neo Committee, composed of members and consensus nodes that govern the Neo blockchain. The Neo Committee provides specific

			services, such as maintaining the liveliness of the network and adjusting critical blockchain parameters. 100 million NEO were generated at genesis. The release schedule can be found in the Neo White Paper.
G.8	Utility Tokens Redemption	Only applicable if field G.7 is true. Information on how utility tokens can be redeemed for goods or services to which they relate	1. NEO’s Utility Core: Access to Network Governance Services As a utility token, NEO’s primary value lies in granting holders exclusive access to Neo’s governance services—a critical "service" for maintaining the blockchain’s decentralization, security, and evolution. This utility is non-negotiable for participating in Neo’s operation, and aligns with the definition of a utility token (granting access to a platform’s core functions). Key governance services unlocked by NEO include: Access to Consensus Node Voting: NEO holders use their tokens to "redeem" voting rights for Neo’s delegated Byzantine Fault Tolerance (dBFT) consensus nodes. By staking NEO, holders can nominate and vote for candidate nodes (individuals/organizations meeting technical/compliance standards), directly shaping who secures the network (e.g., electing the 21 active consensus nodes that validate transactions and generate blocks). Access to Network Parameter Governance: NEO enables redemption of rights to vote on

			critical network rules—such as adjusting transaction fee structures, modifying consensus parameters (e.g., block generation times), or activating protocol upgrades (e.g., supporting new smart contract languages). These votes are only accessible to NEO holders, making the token a prerequisite for influencing Neo’s operational direction. 2.Redemption Mechanism: Exercising NEO’s Utility Rights While NEO is not "redeemed for physical goods or off-chain services," its utility is "redeemed" through active participation in governance activities—the core service it enables. The redemption process is straightforward and integrated with Neo’s wallet/ governance tools: Token Holding as Redemption Prerequisite: To access NEO’s utility, holders must maintain NEO in a supported wallet (e.g., Neo Wallet, Ledger) — this acts as the "qualification" for redeeming governance rights (no additional token exchange is required; holding NEO directly unlocks the utility). Exercising Redemption via Governance Platforms: Holders redeem NEO’s utility by using governance interfaces (e.g., Neo’s official governance portal) to cast votes for consensus nodes or network parameters. Each NEO token corresponds to voting weight (proportional to the amount held), meaning more NEO held translates to greater influence over the "services" (governance outcomes) it

			unlocks. 3.Additional Utility: Indirect Access to Ecosystem Stewardship Services Beyond direct governance, NEO's utility extends to "redeeming access to ecosystem stewardship"—a secondary service that supports Neo's long-term growth. For example: NEO holders may use their token weight to vote on allocations from Neo's ecosystem reserves (e.g., funding developer grants for decentralized applications, or security audits for network upgrades). This lets holders "redeem" NEO's utility to shape which ecosystem services receive resources, ensuring alignment with community needs. 4.Conclusion: NEO's Utility & Redemption Alignment NEO is a utility token because it grants exclusive access to Neo's core governance and stewardship services—with "redemption" defined as exercising these rights (via voting, staking, or reserve allocation decisions). Unlike traditional utility tokens tied to off-chain goods or transaction fees, NEO's utility is governance-centric—but it still fulfills the core requirement of a utility token: providing holders access to a platform's critical services, with redemption mechanisms tied to activating that access.
G.9	Non-Trading request	Indication as whether an admission to trading is sought	'true' – sought

G.10	Crypto-Assets purchase or sale modalities	Where an admission to trading is not sought, information on how and where the crypto-assets can be purchased or sold after the offer to the public	Not applicable, as the admission to trading of the tokens is sought.
G.11	Crypto-Assets Transfer Restrictions	Restrictions on the transferability of the crypto-assets that are being offered or admitted to trading	The crypto-assets as such do not have any transfer restrictions and are generally freely transferable. The Crypto Asset Service Providers can impose their own restrictions in agreements they enter with their clients. The Crypto Asset Service Providers may impose restrictions to buyers and sellers in accordance with applicable laws and internal policies and terms.
G.12	Supply Adjustment Protocols	Indication as to whether the cryptoasset has protocols for the increase or decrease of their supply in response to changes in demand	‘false’ – No
G.13	Supply Adjustment Mechanisms	Where the crypto-assets has protocols for the increase or decrease of their supply in response to changes in demand, a description of the functioning of such protocols	Not applicable.
G.14	Token Value Protection Schemes	Indication as to whether the cryptoasset has a protection scheme protecting the value of the cryptoasset	‘false’ – No
G.15	Token Value Protection Schemes Description	Where the field above is true, a description of the protection schemes protecting the value of the cryptoassets	Not applicable.
G.16	Compensation Schemes	Indication as to whether the cryptoasset has a compensation schemes	‘false’ – No
G.17	Compensation Schemes Description	Where the field above is true, a description of the compensation schemes	Not applicable.

G.18	Applicable law	The law applicable to the cryptoassets	Applicable law likely depends on the location of any particular transaction with the token.
G.19	Competent court	Competent court	Competent court likely depends on the location of any particular transaction with the token.
Part H – information on the underlying technology			
H.1	Distributed ledger technology	Field to be filled in only if a DTI is not provided in field F.14. Information on the technology used, including distributed ledger technology	Neo, envisioned by CTO co-founder Erik Zhang and developed from scratch by its team, is a feature-complete blockchain platform for building decentralized applications. Neo enables developers to digitize and automate the management of assets through smart contracts. NeoVM in Neo N3 is a lightweight, stack-based virtual machine designed for executing smart contracts with high efficiency and determinism. It supports Turing-complete logic and is language-agnostic, allowing developers to write contracts in C#, Python, Go, and more via NeoCompiler. The VM architecture includes an Execution Engine, Evaluation Stack, Invocation Stack, and Result Stack, enabling isolated and secure execution contexts. The Interoperation Service Layer bridges smart contracts with blockchain data (e.g., blocks, transactions, assets), and NeoVM supports advanced features like formal verification, reference counting for memory management, and robust exception handling.

			NeoContract is Neo N3's smart contract framework, tightly integrated with NeoVM and designed for enterprise-grade dApps. It provides a rich API via the Neo.SmartContract.Framework, enabling access to blockchain state, persistent storage, and runtime services. Contracts can define static properties, verification methods, and lifecycle hooks like _deploy, update, and destroy. Developers can use templates for NEP-17 tokens, oracles, and ownership logic, and compile contracts into .nef bytecode using the NeoCompiler.CSharp tool. The framework emphasizes modularity, security (e.g., witness checks), and ease of use for .NET developers. Neo also provides powerful native infrastructures such as decentralized storage, oracles, and domain name service.
H.2	Protocols and technical standards	Information about protocols and technical standards used	Neo N3 introduces updated NEP standards to improve interoperability and functionality: NEP-17: The fungible token standard replacing NEP-5. It defines methods like balanceOf, transfer, totalSupply, and events like Transfer. It includes strict validation rules and integrates with contract-to-contract calls via onNEP17Payment. NEP-11: The NFT standard, supporting both single and batch token transfers, metadata queries, and ownership tracking. It enables unique asset representation on-chain. NEP-29: A metadata standard for

			smart contracts, ensuring consistent documentation and discoverability across the Neo ecosystem. On Neo N3, NEO is a native NEP-17 token used for governance. It was registered in the Genesis block and stored in multi-signature addresses of standby validators.
H.3	Technology Used	Other information on the technology used for holding, storing and transferring crypto-assets, if relevant	Neo uses elliptic curve cryptography (ECC), specifically the secp256r1 curve, for key generation, digital signatures, and identity verification. This enables secure wallet operations and transaction authentication. Neo also supports SHA-256 and RIPEMD-160 hashing algorithms for address generation and data integrity. For smart contract interactions and consensus, Neo integrates cryptographic primitives into its virtual machine (NeoVM), allowing contracts to verify signatures and perform secure operations. Neo uses custom peer-to-peer (P2P) and remote procedure call (RPC) protocols for node communication and external interactions.
H.4	Consensus Mechanism	Information on the consensus mechanism, where applicable	Byzantine Fault Tolerance mechanism is a universal solution for distributed systems. NEO proposes dBFT (delegated Byzantine Fault Tolerance) consensus algorithm based on PBFT (Practical Byzantine Fault Tolerance) algorithm. Algorithm dBFT determines validator set according to real-time blockchain voting, which effectively enhances the effectiveness of the algorithm,

			bringing block time and transaction confirmation time savings. dBFT2.0 as an upgraded version was released in Mar. 2019, which improves robustness and safety by introducing 3-stage consensus as well as a recovery mechanism.
H.5	Incentive Mechanisms and Applicable Fees	Information on incentive mechanisms to secure transactions and any applicable fees	NEO holders participate in governance by voting for the Neo Committee, composed of members and consensus nodes that govern the Neo blockchain. The Neo Committee provides specific services, such as maintaining the liveliness of the network and adjusting critical blockchain parameters. Neo Committee is incentivized by GAS rewards for maintaining liveliness.
H.6	Use of Distributed Ledger Technology	Indication as to whether the crypto-assets are issued, transferred and stored using distributed ledger technology that is operated by the issuer, the offeror or a third-party acting on their behalf	true' – Yes, DLT operated by the issuer or a third-party acting on the issuer's behalf
H.7	DLT Functionality Description	If the DLT is operated by the issuer or a third party acting on the issuer's behalf, a detailed description of the functioning of such distributed ledger technology	Neo N3 utilizes a decentralized distributed ledger technology (DLT) to maintain a secure, transparent, and tamper-resistant record of transactions and smart contract executions. The Neo blockchain operates through a peer-to-peer network of nodes, where each node maintains a synchronized copy of the ledger. Transactions are validated and added to the ledger using Neo's delegated Byzantine Fault Tolerance (dBFT) consensus mechanism, which ensures fast

			finality and fault tolerance by electing a group of consensus nodes through on-chain governance. The ledger is structured as a chain of cryptographically linked blocks, each containing a set of verified transactions. Smart contracts deployed on Neo are executed deterministically via the NeoVM, and their state changes are recorded immutably on the ledger.
H.8	Audit	Indication as to whether an audit of the technology was conducted	'true' – Yes
H.9	Audit outcome	If an audit was conducted, information on the outcome of the audit of the technology used	As requested by Neo, the company Red4Sec has been asked to perform a security audit on the following projects: Neo, Neo-vm, Neo-devpack-dotnet, Neo-node, Neo-modules, in order to assess the security of the projects as part of the vulnerability review, management process and the logic and assemble of each one on the Neo platform. This security audit has been carried out between the dates: N3 Release Candidates: 17-03-2021 to 28-05-2021 The Red4Sec audit highlights several positive findings about the Neo N3 Mainnet (version 3.0.2), confirming it as a secure, functional, and stable platform. All critical and high-risk vulnerabilities identified during the review have been successfully resolved, and the cryptographic primitives were found to be correctly designed, securely implemented, and effectively maintained. The Neo team has

			demonstrated a strong commitment to security by actively collaborating with Red4Sec through continuous reviews, remediations, and improvements. Additionally, the project's structured approach to integrating testing, analysis, and periodic code reviews reflects a proactive effort to maintain and further enhance the platform's reliability and resilience.
J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts			
S.1	Name	Name reported in Annex II to Commission Implementing Regulation (EU) 2024/2984 (1), Table 2, fields A.1, B.2 or C.1, Table 3, field A.1, or Table 4, or name of the crypto-asset service provider	Neo Global Development Ltd
S.2	Relevant legal entity identifier	Identifier referred to in Annex II to Implementing Regulation (EU) 2024/2984, Table 2, fields A.6 or A.7, B.7 or B.8 or C.6 or C.7, Table 3, fields A.7 and A.8 or Table 4, fields A.7 and A.8 or identifier of the crypto-asset service provider referred to in Article 1 of Commission Delegated Regulation (EU) 2025/305 ([2])	Not applicable.
S.3	Name of the crypto-asset	Name of the crypto-asset, as reported in Annex II to Implementing Regulation (EU) 2024/2984, Table 2, field D.2, Table 3, field B.1, or Table 4, field B.1 where relevant	NEO
S.4	Consensus Mechanism	The consensus mechanism, as reported in Annex II to Implementing Regulation (EU) 2024/2984, Table 2, field H.4, Table 3, field E.4, or Table 4, field E.5, where relevant, including the information referred to in Article 6(1), point (b), of this Regulation.	dBFT

S.5	Incentive Mechanisms and Applicable Fees	Incentive mechanisms to secure transactions and any fees applicable, as reported in Annex II to Implementing Regulation (EU) 2024/2984, Table 2, field H.5, Table 3, field E.5 or Table 4, field E.6, where relevant. For persons drawing up a crypto-asset white paper pursuant to Articles 6, 19 or 51 of Regulation (EU) 2023/1114, the information may be provided by including a cross-reference to the aforementioned fields.	Not applicable.
S.6	Beginning of the period to which the disclosed information relates	Start date of the period covered by the disclosed information	20.10.24
S.7	End of the period to which the disclosed information relates	End date of the period covered by the disclosed information	20.10.25
Mandatory key indicator on energy consumption			
S.8	Energy consumption	Total amount of energy used for the validation of transactions and the maintenance of the integrity of the distributed ledger, expressed in kilowatt-hours per calendar year	36,792 kWh/year
Sources and methodologies			
S.9	Energy consumption sources and methodologies	Sources and methodologies used in relation to the information reported in field S.8	Consensus Mechanism: Delegated Byzantine Fault Tolerance (DBFT) Number of Nodes: 21 Server Type: Average tech servers (e.g., mid-range cloud VMs or physical servers) Typical Power Draw per Server: ~200 watts (0.2 kW) 21 consensus servers × 200 W each × 8,760 hours/year = 36,792 kWh/year. Uptime: 24 hours/day

			The energy consumption of this asset is aggregated across multiple components: to determine the energy consumption of a token, the energy consumption of the network is calculated. The information regarding the hardware used and the number of participants in the network is based on assumptions that are verified with best effort using empirical data. In general, participants are assumed to be largely economically rational. As a precautionary principle, we make assumptions on the conservative side when in doubt, i.e. making higher estimates for the adverse impacts.
Supplementary information only mandatory if the annual energy consumption is 500MWh (or 500,000kWh) or more			
S.10	Renewable energy consumption	Share of energy from renewable sources, used for the validation of transactions and the maintenance of the integrity of the distributed ledger, expressed as a percentage of the total amount of energy used per calendar year	Neo consensus nodes are typically hosted on cloud infrastructure or enterprise-grade data centers. Common providers for blockchain validators include AWS, Azure, Google Cloud. Industry Average for Cloud Hosting: Around 65–75% renewable energy today 1. Key Data Total annual energy consumption (for transaction validation & ledger maintenance): 36,792 kWh Annual renewable energy consumption (for the same purposes): 25,754 kWh (estimated based on global cloud provider renewable energy average of ~70%) 2. Calculation Formula Renewable Energy Share (%) = (Renewable Energy Consumption / Total Energy Consumption) × 100% 3. Calculation Substitute data into the formula:

			(25,754 kWh / 36,792 kWh) × 100% = 70% 4. Conclusion The estimated annual share of renewable energy for transaction validation and distributed ledger integrity maintenance is 70%, based on industry averages for cloud infrastructure sustainability.
S.11	Energy intensity	Average amount of energy used per validated transaction	1. Key Data Total annual energy consumption (for transaction validation & ledger maintenance): 36,792 kWh Total number of validated transactions per year: 1,000,000,000 2. Calculation Formula Energy Intensity (kWh/transaction) = Total Annual Energy Consumption (kWh) ÷ Total Annual Validated Transactions 3. Calculation Substitute data into the formula: (36,792 kWh ÷ 1,000,000,000 transactions) = 0.000036792 kWh/transaction ($\approx$ 0.037 Wh/transaction) 4. Conclusion The average energy intensity for transaction validation and distributed ledger integrity maintenance on the Neo N3 network is approximately 0.000036792 kWh per transaction, which is significantly lower than most blockchain platforms due to Neo's energy-efficient dBFT consensus mechanism.
S.12	Scope 1 DLT GHG emissions – Controlled	Scope 1 GHG emissions per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger	0 tCO_2e/year (Neo uses electricity only; no direct fuel combustion)

S.13	Scope 2 DLT GHG emissions – Purchased	Scope 2 GHG emissions, expressed in tCO2e per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger	Key Data: Purchased electricity for DLT core operations: 36,792 kWh/year Regional grid emission factor: 0.00035 tCO_2e/kWh Calculation: 36,792 kWh × 0.00035 tCO_2e/kWh = 12.88 tCO_2e/year
S.14	GHG intensity	Average GHG emissions (scope 1 and scope 2) per validated transaction	Annual Scope 1 GHG emissions: 0 tCO_2e Annual Scope 2 GHG emissions: 12.88 tCO_2e Annual total validated transactions: 1,000,000,000 Calculation: (12.88 tCO_2e × 1000) ÷ 1,000,000,000 = 0.000013 $kgCO_2e$/transaction
Sources and methodologies			
S.15	Key energy sources and methodologies	Sources and methodologies used in relation to the information reported in fields S.10 and S.11	To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from Our World in Data.

S.16	Key GHG sources and methodologies	Sources and methodologies used in relation to the information reported in fields S.12, S.13 and S.14	To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from Our World in Data.