

White Paper greenfeetoken (GFT)

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Contents

	Date of Notification	11
	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	11
	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	11
	4 Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114	11
	Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	11
	Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114	11
	Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114	12
	Characteristics of the crypto-asset	12
	Information about the quality and quantity of goods or services to which the utility Tokens give access and restrictions on the transferability	17
	Key information about the offer to the public or admission to trading	18
Par	t A – Information about the offeror or the person seeking admission to trading	23
	Name	23



Legal Form	23
Registered Address	23
Head office	23
Registration date	23
Legal entity identifier (LEI)	23
Another identifier required pursuant to applicable national law	23
Contact telephone number	23
E-Mail address	23
Response time (Days)	24
Parent company	24
Members of the management	24
body	24
Business activity	24
Parent Company Business Activity	24
Newly Established	24
Financial Condition for the Past Three Years	24
Financial Condition Since Registration	26
Part B Information about the issuer, if different from the offeror or person seeking admission to trading	27
Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2	



Part D – Information about the crypto-asset project	27
Crypto-asset project name	27
Crypto-assets name	27
Abbreviation	27
Crypto-asset project description	27
Details of all natural or legal persons involved in the implementation of the crypto-asset project	28
Utility Token Classification	28
Key Features of Goods/Services for Utility Token Projects	28
Plans for the Token	28
Resource allocation	29
Planned use of Collected funds or crypto-Assets	30
Part E – Information about the offer to the public of crypto-assets or their admission to trading	32
Public offering or admission to trading	32
Reasons for public offer or admission to trading	32
Fundraising target	32
Minimum subscription goals	32
Maximum subscription goal	32
Oversubscription acceptance	32
Oversubscription allocation	33



Issue price	33
Official currency or any other crypto-assets determining the issue price	35
Subscription fee	35
Offer price determination method	36
Total number of offered/traded crypto-assets	36
Targeted holders	36
Holder restrictions	36
Reimbursement notice	36
Refund mechanism	36
Refund timeline	37
Offer phases	37
Early purchase discount	37
Time-limited offer	38
Subscription period beginning	38
Subscription period end	38
Safeguarding arrangements for offered funds/crypto-assets	38
Payment methods for crypto-asset purchase	39
Right of withdrawal	40
Transfer of purchased crypto-assets	41



	Transfer time schedule	. 42
	Purchaser's technical requirements	. 43
	Crypto-asset service provider (CASP) name	. 43
	CASP identifier	. 43
	Placement form	. 43
	Trading platforms name	. 43
	Trading Platforms Market identifier code (MIC)	. 44
	Trading platforms access	. 44
	Involved costs	. 44
	Offer expenses	. 44
	Conflicts of interest	. 44
	Applicable law	. 44
	Competent court	. 44
Par	t F - Information about the crypto-assets	45
	Crypto-asset type	. 45
	Crypto-asset functionality	. 45
	Planned application of functionalities	. 45
	Type of crypto-asset white paper	. 45
	The type of submission	. 45



	The type of submission Crypto-asset characteristics	45
	Commercial name or trading name	46
	Website of the issuer	46
	Starting date of offer to the public or admission to trading	47
	Publication date	47
	Any other services provided by the issuer	47
	Language or languages of the crypto-asset white paper	47
	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	
	Functionally fungible group digital Token identifier, where available	47
	Voluntary data flag	48
	Personal data flag	48
	LEI eligibility	48
	Home member state	48
	Host Member States	48
Par	t G – Information on the rights and obligations attached to the crypto-assets	48
	Purchaser Rights and Obligations	48
	Exercise of Rights and Obligations	49
	Conditions for modifications of rights and obligations	49



	Future public offers	49
	Issuer retained crypto-assets	49
	Utility Token classification	49
	Key features of goods/services of utility Tokens	49
	Utility Tokens redemption	50
	Non-trading request	50
	Crypto-assets purchase or sale modalities	50
	Crypto-assets transfer restrictions	50
	Supply adjustment protocols	50
	Supply adjustment mechanisms	50
	Token value protection schemes	50
	Token value protection scheme description	51
	Compensation schemes	51
	Compensation scheme description	51
	Applicable law	51
	Competent court	51
Part	H — Information on the underlying technology	51
	Distribution ledger technology (DLT)	51
	Protocols and technical standards	52



	Technology used	52
	Consensus mechanism	52
	Incentive mechanisms and applicable fees	52
	Use of Distributed Ledger Technology	53
	DLT Functionality Description	53
	Audit	53
	Audit outcome	53
Par	t I — Information on risks	53
	Offer-related risks	53
	Issuer-related risks	57
	Crypto-assets-related risks	57
	Project implementation-related risks	59
	Technology-related risks	61
	Mitigation measures	63
Par	t J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse imp	
••••		66
	Adverse impacts on climate and other environment-related adverse impacts	66
	landatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus nechanism	67
	Field	67 67
		n/



General Information	67
Name	67
Relevant legal entity identifier	67
Name of the crypto assets	67
Consensus Mechanism	67
Incentive Mechanisms and Applicable Fees	67
Beginning of the period to which the disclosure relate	68
End of the period to which the disclosure relates	68
Energy consumption	68
Energy consumption sources and methodologies	68
Renewable energy consumption	68
Energy intensity	68
Scope 1 DLT GHG emissions – controlled	68
Scope 2 DLT GHG emissions – purchased	68
GHG Intensity	68
Key energy sources and methodologies	69
Key GHG sources and methodologies	69
Optional information on the principal adverse impacts on the climate and on other environment-related adverse impacts of the consensi mechanism	us 69



Energy mix	69
Carbon intensity	70
Generation of waste electrical and electronic equipment (WEEE)	70
Non-recycled WEEE ratio	70
Generation of hazardous waste	70
Generation of waste (all types)	70
Non-recycled waste ratio (all types)	
Waste intensity (all types)	71
9 Impact of the use of equipment on natural resources	71
Water use	71
Non-recycled water ratio	71
Key energy sources and methodologies	
Other GHG sources and methodologies	71
Waste sources and methodologies	71
Natural resources sources and methodologies	71



01	Date of Notification	13.08.2025
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.
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 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.
04	4 Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.
05	Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	The utility Token referred to in this white paper may not be exchangeable against the good or service promised in the crypto-asset white paper, especially in the case of a failure or discontinuation of the crypto-asset project.
06	Statement in accordance with Article 6(5), points (e)	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and



	and (f) of Regulation (EU)	of the Council.
	2023/1114	
		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 offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law.
		This crypto-asset white paper does not constitute a prospectus as referred to in Regulation
		(EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.
08	Characteristics of the crypto-asset	8.1 Brief description of the crypto asset
		The greenkeeper GmbH has established the first integrated system that enables the transparent and traceable mapping of the complete lifecycle of tokenized CO ₂ certificates — from initial project development through to final retirement. In order to



ensure the highest level of integrity and verifiability, greenkeeper GmbH conducts its own certification of the CO₂ storage capacity of forests.

Certification is awarded exclusively to sustainably managed forest projects. This approach serves the dual objective of reducing monocultures and enhancing biodiversity, while simultaneously improving the quality of harvested timber. High-quality timber, in turn, can be processed into long-life wood products, thereby ensuring that the stored CO_2 remains sequestered for extended periods.

The company's proprietary retirement mechanism allows corporate and private entities to offset CO_2 emissions autonomously, without reliance on any intermediary, while receiving a verifiable compensation certificate. The greenkeeper GmbH registry facilitates continuous verification of such certificates by independent auditing entities, providing real-time access to satellite monitoring data for the corresponding forest projects. The entire process is also described here:

https://www.youtube.com/watch?v=GNzM3I6Jgzw

This Whitepaper contains the information required under Regulation (EU) 2023/1114 (*Markets in Crypto-Assets Regulation* – MiCA) for the public offering of the greenfeetoken (GFT). It describes the characteristics, purpose, and functioning of the GFT, the issuance plan, the use of proceeds, and the associated risks. The objective is to provide potential purchasers with a well-founded basis for their investment decision.



The greenfeetoken:

The GFT is a utility Token designed for use within the greenkeeper platform ("platform"). Each GFT represents the right to compensate for one ton of CO_2 emissions. This right is supported by verified CO_2 storage achieved through sustainable forest management. Token holders of the GFT can utilize it on the greenkeeper compensation platform to offset their private or corporate CO_2 emissions. GFT used for CO_2 emission compensation are irreversibly burned. The burning process represents the retirement of conventional CO_2 certificates on the voluntary carbon market (VCM).

Each GFT sold directly provides financial support to a forest owner to implement measures aimed at ensuring the long-term resilience of the forest. The specific measures required depend on the respective forest project and may include, for example, the conversion to mixed forests, the construction of fences to protect young trees, or the creation of forest edges to shield the forest from dry winds while simultaneously creating habitats that foster additional biodiversity. All measures are audited by the forestry team of greenkeeper GmbH, and progress reports on the condition of the forest are published on a regular basis.

A total of 40,500,000 GFT are pre-minted in the Global Reserve Pool. Each time greenkeeper GmbH certifies a new forest, 95% of the corresponding GFT are transferred to the greenkeeper Pool, while the remaining 5% are allocated to the Treasury. This token transfer is executed via a multi-signature process and is subject to external auditing.



GFT from the greenkeeper Pool may be sold by greenkeeper GmbH on the market to provide financial support for additional forest projects. The increase in circulating supply through the issuance of new GFT is counterbalanced by the retirement of GFT, in which retired tokens are permanently destroyed and cannot be reissued.

After the Token Generation Event (TGE), GFT will be listed on a Crypto Exchange. We aim for an initial listing price of €55 per GFT. Once listed, the price will fluctuate based on market supply and demand. As the aim is to maintain price stability, all GFT distributions will include appropriate vesting periods tailored to each partnership or initiative.

The vision of greenkeeper is that forest protection is a collective, community-wide responsibility. Every holder of a GFT becomes part of the greenkeeper community. The greenkeeper GmbH may develop GFT-gated programs in the future.

8.2 Rights of the Token Holders

The rights of the Token Holders associated with GFTs arise from:

- This white paper, outlining the Token's purpose and functionality.
- The Terms and Conditions (T&C) of greenkeeper GmbH, defining staking requirements and benefits.

Holders of GFT are entitled to:

 Burn GFT for the compensation of their CO₂ emissions and/or save the equivalent storage capacity in the forest. Marketplaces and registries where the GFT is used may charge a burning fee per GFT and per transaction.



- The ability to freely transfer unstaked Tokens, while staked Tokens remain locked for the agreed period.
 - No redemption rights for fiat or other crypto-assets. GFT is used for compensation of CO₂ emissions via the greenkeeper platform or other market places which accept the GFT.
 - Independent of the market price, the GFT has a value of 1 ton of CO₂ stored through sustainable forest management.
 - Note: Holding the token does not grant the holder any legal, contractual, or proprietary right to demand, take delivery of, or otherwise obtain the underlying physically stored CO₂ of the GFT.

8.3 Modification of Rights and Obligations

The agreed rights of the Token Holders are binding. Any changes to the discount model or staking requirements apply only to future agreements and do not affect GFT already bought or burned.

8.4 Transferability and Staking Mechanism

Unstaked GFT bought during Presale or on an exchange are freely transferable.

Currently, staking is not foreseen.

GFT purchased directly on the greenkeeper compensation platform are non-transferable. They can only be held or burned within the platform for emission compensation.



		8.5 Gas Fees All blockchain transactions related to GFT, including staking, unstaking, and transfers, require gas fees paid by the Token holder. These fees depend on Base blockchain
		network conditions and must be covered in Ethereum (ETH). Since the staking amount is based on the prevailing average market price on decentralized exchanges, issuers should be aware of potential price fluctuations before committing their Tokens.
		 8.6 Future Developments greenkeeper GmbH may introduce additional functionalities for GFT in compliance with regulatory requirements. Possible future use cases include: Extended platform utilities. Incentive programs for ecosystem growth.
		All changes will be transparently communicated to Token holders.
09	Information about the quality and quantity of goods or services to which the utility Tokens give	Europe has approximately 162 million hectares of forest, of which around 1% dies each year – caused by climate stress, drought, pests, and other factors. This loss can now be precisely measured using satellite imagery and AI-supported tree crown detection. greenkeeper GmbH aims to actively counteract this annual decline. In total, 40.500.000 GFT are to be issued – each representing the actual preservation of a forest parcel of at



	access and restrictions on the transferability	least one hectare in size, ensuring the long-term retention of at least one ton of sequestered CO ₂ . The measures for stabilizing, revitalizing, or restoring forests are based on scientifically sound ecological principles. Their effectiveness is monitored using satellite technology (e.g., data from the European Space Association (ESA)), documented on the blockchain, and made transparently traceable – not as a speculative crypto asset, but as a real, verifiable environmental service.
		The GFT is a utility token Each GFT represents the right to compensate for one ton of CO_2 . To utilize GFT for CO_2 emission compensation, it is required to access the greenkeeper® platform. To compensate for emissions, Token holders must burn enough GFT corresponding to the amount of their CO_2 emissions project (e.g. a specific construction site, a business trip, etc.).
10	Key information about the offer to the public or admission to trading	Global Reserve Pool: Initially, all 40.500.000 Tokens are preminted into the Global Reserve Pool. Every time a new forest is certified, Tokens, corresponding to 95% of the CO ₂ storage capacity of the forest, are transferred to the greenkeeper pool. The remaining 5% are moved to the treasury.



Note that no additional GFT will be minted and that the total number of GFTs decreases through burning when they are utilized for CO₂ emission compensation.

greenkeeper Pool:

The greenkeeper pool contains only GFTs backed by verified CO_2 storage achieved through sustainable forest management. Verified and unlocked GFTs can be sold by greenkeeper GmbH via sales funnels, the greenkeeper compensation platform and via exchanges. Every time circulating GFTs are burned for emission compensation the circulating supply is topped up with GFT from the greenkeeper Pool.

Treasury:

Every time the CO_2 storage capacity of a new forest is verified, 5% of the unlocked GFT will be moved to the treasury. The treasury serves as a contingency reserve in case a forest is destroyed or damaged. In that case, the number of GFT corresponding to the degree of damage are taken from the treasury and are burned in order to protect the validity of all other circulating GFT.

Ecosystem Growth Reserve:

The Ecosystem Growth Reserve initially consists of 150,000 GFT. The Ecosystem Growth Reserve is used to scale the ecosystem of the GFT - Any unsold GFTs from the Public Offering of the GFT will be added to the Ecosystem Growth Reserve, ensuring that the total supply remains unchanged and optimally allocated for ecosystem expansion. GFT which remain after the Public Offering will stay in the Ecosystem Growth Reserve and



will be used for continuous ecosystem development (e.g. new listings, bonus programs (if any))

Liquidity Reserve:

A Liquidity Reserve for the GFT will be established on an exchange, allowing the community to engage in open-market trading. The Liquidity Reserve is fully unlocked at listing to ensure a stable market environment and efficient trading conditions. The number of GFTs in the Liquidity Reserve corresponds to 10% of the total number of circulating GFTs at the time of the TGE.

GFT Distribution during the Public Offering:

The Public Offering is divided into the **Private Presale** and the **Public Presale**. The Private Presale can only be accessed on invitation while the Public Presale is open to everyone. For the Public Offering the greenkeeper GmbH pre-certified forests corresponding to 1.485.000 GFT. These GFT are allocated as follows:

- 100,000 GFT are allocated for the Private Presale.
- 1.000.000 GFT are allocated for the Public Presale.
- 150.000 GFT are allocated to the Ecosystem Reserve Pool.
- 150.000 GFT are allocated to the Liquidity Reserve.
- Equity investors, who invested directly into the greenkeeper GmbH get 1000 GFT per €100.000 investment.



- After the Token Generation Event the Treasury will be filled corresponding to 5% (up to 75.000 GFT) of the GFTs which were unlocked from the Global Reserve Pool to the greenkeeper Pool.
- Team Tokens: No team member owns GFT unless purchased at their own expense during the Public Offering.

Following table summarises the GFT distribution for the Public Offering:

Allocation	Percentage of total supply	Tokens
Global Reserve Pool	96.33%	39.015.000
Private Sale	0.25%	100.000
Public Presale	2.5%	1.000.000
Ecosystem Growth	0.37%	150.000
Liquidity Reserve	0.37%	150.000
Treasury	5% of circulating supply	75.000
Investors	0.025%	10.000
Team	0%	0
Total	100%	40.500.000



10.2 Details of the Private Presale and Public Presale

Depending on the Presale phase the GFT price and vesting period varies:

Phase	Tokens	Price per Token [EUR]	capitalization [EUR]	Vesting
Private Sale (on invite)	100.000	35,00	3.500.000	48-weeks
Public Presale 1	350.000	40,00	14.000.000	36-weeks
Public Presale 2	350.000	42,50	14.875.000	24-weeks
Public Presale 3	300.000	45,00	12.500.000	12-weeks
Total	1.100.000		44.875.000	

Note that, equity GFTs distributed to investors and GFTs distributed from the Ecosystem Growth Reserve have a **vesting period of 48 weeks**.

Any unsold GFTs from the Public Offering will be added to the Ecosystem Growth Reserve, ensuring that the total supply remains unchanged and optimally allocated for ecosystem expansion.

10.3 Listing Price and Trading Availability

The Token Generation Event does not mark the immediate start of trading. A Liquidity Pool for the GFT will be established on a Crypto Exchange, allowing the community to engage in open-market trading. The aim is to list for €55. However, it is not certain that the price of €55 can be kept. The market price of GFT (if any) may fluctuate significantly.



		Further exchange listings (if any) will be announced separately, based on market demand and strategic partnerships.
Part A tradin		the offeror or the person seeking admission to
A.1	Name	greenkeeper GmbH
A.2	Legal Form	GmbH
A.3	Registered Address	Schumannstr. 2, 81679 München
A.4	Head office	Not applicable
A.5	Registration date	20.05.2022
A.6	Legal entity identifier (LEI)	391200S2SQD4RY3IGF54
A.7	Another identifier required pursuant to applicable national law	Not applicable
A.8	Contact telephone number	+491621708344
A.9	E-Mail address	support@greenkeeper.eco



A.10	Response time (Days)	5	
A.11	Parent company	Not applicable	
A.12	Members of the management body	Paul Pletsch DrIng. Leonhard Vidal	Schumannstr. 2, 81679 München Schumannstr. 2, 81679 München
A.13	Business activity		forest based CO ₂ -Tokens for CO ₂ emission cordance with CSRD- and ESG-Regulations.
A.14	Parent Company Business Activity	Not applicable	
A.15	Newly Established	False	
A.16	Financial Condition for the Past Three Years	held company focused on environ development, and the creation an company prepares its annual final	022 and based in Munich (HRB 277161), is a privately imental consulting, regenerative land-use id trading of blockchain-based certificates. The ncial statements in accordance with the German als are compiled by the tax consultancy Südmeyer,



Graf & Partner under IDW S7 Type 2 plausibility review. As a small enterprise under \$267 HGB, the company is not subject to statutory audit requirements.

For the past years, greenkeeper GmbH has focused its resources on forest acquisition and development of the greenkeeper system including the novel emission compensation process.

In the fiscal year 2022, greenkeeper GmbH generated revenue of $\[\in \]$ 6,360 and recorded a net loss of $\[\in \]$ 11,489. Equity at year-end amounted to $\[\in \]$ 13,511, with total assets of $\[\in \]$ 15,492. Cash at the bank represented the entire asset base.

In 2023, revenues increased slightly to $\in 8,101$, with a reduced net loss of $\in 8,184$. Yearend equity stood at $\in 5,327$, with total assets of $\in 8,302$ and cash holdings of $\in 7,257$.

In 2024, revenue grew significantly to €19,627, reflecting the company's expanding project activity and partnerships. The net loss for the year amounted to €10,069. As of December 31, 2024, equity was negative at €–4,743, with total assets of €25,207. Cash holdings were €3,025, while liabilities – including shareholder loans – totaled €23,907.

The financial trajectory illustrates consistent revenue growth alongside strategic early-stage investments in digital infrastructure, certification frameworks, and market expansion. Losses reflect upfront development and operational costs. Liquidity has been maintained throughout, supported by shareholder contributions, public funding, and project-based income.



		In 2025, greenkeeper GmbH was awarded a non-dilutive €50,000 grant by the European Space Agency Business Incubation Centre (ESA BIC) to support the integration of satellite-based monitoring technology into its CO₂ certification platform. Additionally, the company is currently conducting an equity financing round with a target volume of up to €1 million, representing up to 10% of post-money equity. The proceeds will be used to scale the platform, expand into new European markets, and further integrate tokenized CO₂ and biodiversity credits into both voluntary and regulated frameworks.
A.17	Financial Condition Since Registration	Not applicable, as greenkeeper GmbH has been established for more than three years.



Part B Information about the issuer, if different from the offeror or person seeking admission to trading

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

Not applicable

Part D – Information about the crypto-asset project

D.1	Crypto-asset project name	greenkeeper CO ₂ compensation platform
D.2	Crypto-assets name	greenfeetoken
D.3	Abbreviation	GFT
D.4	Crypto-asset project description	The GFT is a utility token. Each GFT represents the right to compensate for one ton of ${\rm CO_2}$ emissions. This right is supported by verified ${\rm CO_2}$ storage achieved through sustainable forest management. It can be used on the greenkeeper platform in the



		course of greenkeepers CO be claimed when the Token	-	ion process. Compensation can only c customer project.
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Name Paul Pletsch DrIng. Leonhard Vidal Dr. Aschkan Allahgholi	Role CEO CEO/COO CTO	Address Schumannstr. 2, 81679 München Schumannstr. 2, 81679 München Schumannstr. 2, 81679 München
D.6	Utility Token Classification	True		
D.7	Key Features of Goods/Services for Utility Token Projects	CO ₂ emissions. This right sustainable forest manage course of greenkeepers CO	is supported by verified ment. It can be used or a emission compensati burned for a specific c	ne right to compensate for one ton of CO ₂ storage achieved through the greenkeeper platform in the ion process. Compensation can only sustomer project. Each GFT directly
D.8	Plans for the Token	for the Public Presale. Addi	tional 10.000 Tokens ar	re allocated for equity investors and e. 150.000 GFT are for the Ecosystem



		Growth Reserve. The Treasury will initially contain 75.000 Tokens that corresponds to
		~5% of the circulating supply during listing.
		After Public Offering customers can
		Buy Tokens on the exchange
		Buy Tokens on the greenkeeper platform
		$ullet$ GFT can be utilized for ${ m CO_2}$ emission compensation on the greenkeeper platform.
		Other features might follow.
		The main intention of greenkeeper is to support as many forests located across the geographic continent of Europe, including countries both inside and outside the European Union as possible. As greenkeeper can support forests only when new GFTs are unlocked from the Global Reserve Pool and sold, this process furthermore ensures that the exchange is regularly topped up with new Tokens from the greenkeeper pool. Due to the burning process, the total supply of GFT is continuously shrinking, making the GFT overall deflationary.
D.9		The development and operation of the greenkeeper platform and GFT are supported by
	Resource allocation	the following resource allocations:
		1. Financial resources
		a. Greenkeeper GmbH has secured funding through previous investments
		and grants to finance the platform's continued development and
		regulatory compliance, including both compliance with the token
		economy framework and with applicable regulatory requirements under



		 -compatible blockchains, ensuring flexibility, interoperability, and security for tokenized financial instruments. b. Smart contracts and Tokenization infrastructure are developed in-house
		and with partners, with regular security audits conducted by independent firms to ensure reliability and compliance.
		 3. Human capital and strategic partnerships a. The development team consists of blockchain engineers and regulatory specialists, ensuring both technical robustness and compliance. b. greenkeeper GmbH collaborates with regulated financial service providers and legal experts to ensure that the GFT complies with MiCAR requirements.
		These resource allocations ensure the long-term scalability, security, and regulatory compliance of the greenkeeper platform.
D.10	Planned use of Collected funds or crypto-Assets	Funds collected from the Public Offering will be used to support the certified forests and to strategically enhance platform capabilities and ecosystem growth. On average 33% of the collected funds are used to directly finance the forest projects. Note that in contrast to other certifiers, greenkeeper does not charge forest owners for certifying their forests. The rest is used for:



 Operational costs – forest monitoring via satellite systems, audits of the supported forests and Forest certification (including e.g. travel costs) Personnel Platform development and compliance – Ongoing infrastructure improvements, security audits, and regulatory alignment, especially with the European regulation for carbon markets. Improvement and maintenance of warning systems such as fire and deforestation alarms. Liquidity provisioning – Funding of the Crypto Exchange Liquidity Pool to support trading stability. Ecosystem incentives – Growth initiatives, strategic partnerships, and issuer adoption programs. This structured approach ensures that collected funds are used efficiently to scale the
platform, enhance liquidity, and drive ecosystem adoption.



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	Public offering
E.2	Reasons for public offer or admission to trading	The reason for the Public Offering of GFT is to support as many forests as quickly as possible and to acquire funds for further development, further forest certification and for scaling of the greenkeeper platform. Funds raised will be allocated to forest project funding, forest certification, enhancing platform security, scalability, and expanding Tokenization features.
E.3	Fundraising target	44.875.000EUR
E.4	Minimum subscription goals	Not applicable
E.5	Maximum subscription goal	50.000.000EUR
E.6	Oversubscription acceptance	False



E.7	Oversubscription allocation	Not applicable					
E.8	Issue price	·	The price of GFT during the Public Offering follows a structured pricing model, from €35 per GFT during the Private Presale to €45 per GFT in the last phase of the Public Presale				
		aim is to list for market price of right to terminat Offering will cor	After the Token Generation Event (TGE), GFT will be listed on a Crypto Exchange. The aim is to list for €55. However, it is not certain that the price of €55 can be kept. The market price of GFT (if any) may fluctuate significantly. greenkeeper GmbH reserves the right to terminate the Public Offering before all allocated Tokens are sold. The Public Offering will conclude either when the full allocation is sold or at the discretion of greenkeeper GmbH, depending on market conditions.				
		Phase	Tokens	Price per Token [EUR]	capitalization [EUR]	Vesting	
		Phase Private Sale (on invi			capitalization [EUR] 3.500.000	Vesting 48-weeks	
				[EUR]			
		Private Sale (on invi	te) 100.000	[EUR] 35,00	3.500.000	48-weeks	
		Private Sale (on invi	te) 100.000 350.000	35,00 40,00	3.500.000 14.000.000	48-weeks 36-weeks	



To comply with investor withdrawal rights under MiCAR (Article 13), the TGE will occur earliest 15 days after the official conclusion of the Public Offering.

Vesting Terms

As we aim for price stability, vesting conditions apply to all GFTs purchased in the Public Offering:

- Purchasers in earlier phases receive a lower price per GFT but accept a longer vesting period.
- GFTs are gradually unlocked over the respective vesting schedule, preventing large immediate sell-offs.
- The vesting period decreases in later phases, allowing purchasers closer to TGE to access liquidity sooner.

Justification for Differentiated Pricing

The tiered pricing model ensures that early participants are compensated for their increased market risk and longer vesting periods:

• Early-phase purchasers accept longer lock-up periods, which delays their ability to transfer Tokens. In return, they receive a lower purchase price as compensation.



		 Later-phase purchasers pay higher prices but benefit from earlier liquidity access. This model balances incentives between early adopters and later-stage purchasers while maintaining fair price discovery. Impact on Other Purchasers The Public Offering pricing model is structured to ensure fairness for all participants: No dilution effect – The Global Reserve Pool remains fixed at 40.500.000 GFT. No additional GFT will be minted., ensuring that pricing variations do not impact the total number of GFT available. Price Stability – The vesting schedules prevent sudden mass sell-offs, protecting later purchasers from excessive volatility caused by early participants. Price Alignment at Listing – Regardless of purchase phase, all purchasers eventually converge to the market-driven price once the GFT is listed, ensuring fair price discovery.
E.9	Official currency or any other crypto-assets determining the issue price	EUR
E.10	Subscription fee	Not applicable



E.11	Offer price determination method	The offer price of GFT is determined through a multi-phase Public Offering model, where purchasers receive discounted pricing in earlier phases in exchange for longer vesting periods. The price increases by € 5 between the Private Presale and the first phase of the Public Presale and in steps of 2.5€ between steps 1-3 of the Public Presale.
E.12	Total number of offered/traded crypto-assets	The total GFT supply is 40.500.000 GFT. Of this, up to 100.000 GFT are offered during Private Presale and 1.000.000 are allocated for the Public Presale. If the full allocation of 1,100,000 GFT (Private Presale + Public Presale) is not sold during the Public Offering, the remaining unsold GFTs will be transferred to the Ecosystem Growth Reserve. The Ecosystem Growth Reserve has an initial size of 150.000 GFT.
E.13	Targeted holders	ALL (all types of investors)
E.14	Holder restrictions	Not applicable.
E.15	Reimbursement notice	According to the Markets in Crypto Assets Regulation (MiCAR), purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114 of the European Parliament and of the Council (MiCAR) or if the offer is cancelled.
E.16	Refund mechanism	If a purchaser exercises their right of withdrawal, the full amount paid will be refunded in the same payment method used for the purchase. Refunds will be processed via the original transaction channel (e.g., fiat or crypto wallet) after submission of the withdrawal request.



E.17	B 6 111 11	greenkeeper GmbH ensures that any refunds requested by retail purchasers exercising
	Refund timeline	their right to withdraw from the purchase of GFTs will be processed without undue
		delay.
		Refunds will be executed promptly and, in any case, no later than 14 days from the date
		on which greenkeeper GmbH is notified of the purchaser's decision to withdraw from
		the purchase agreement.
E.18	Offer phases	The GFT Public Offering is divided into the Private Presale and the Public Presale. The
	Offer priases	Private Presale can only be accessed after invitation. Up to 100.000 GFT will be sold at a
		price of € 35. GFT purchased during the Private Presale have a vesting period of 48
		weeks starting with the TGE.
		The Public Presale is divided into three structured phases, with prices increasing
		progressively and vesting periods decreasing per phase.
		Total Public Presale allocation: 1.000.000 GFT
		Phase duration (f.c. E.8)
		• The price in the Public Presale phase 1 will be €40 per Token and will increase for
		each phase ending with €45 in the Public Offering phase 3.
		 Vesting structure: Longer vesting in early phases to reward early supporters while
		ensuring market stability.
E.19		Purchasers in earlier phases receive a lower price per Token, reflecting their long-term
	Early purchase discount	commitment to the project and the extended vesting schedule.
		The structured pricing and vesting model are as follows:
		Purchasers who acquire Tokens during earlier phases receive a lower purchase price,
		but their Tokens are subject to vesting, ensuring a gradual release over time.
		and their remains and subject to resumb, should be a broad at remains



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		Justification for differentiated pricing: The early purchase discount rewards early adopters who support the project at an initial stage. The vesting mechanism aligns incentives by preventing immediate market liquidation, ensuring stability in the Token economy.
		Impact on other purchasers: The structured pricing and vesting ensure that all purchasers participate under predefined conditions. Earlier investors accept longer lock-up periods in exchange for a lower price, while later-stage purchasers benefit from reduced vesting durations. The listing price ensures a balanced entry point for all participants after the Public Offering is complete.
E.20	Time-limited offer	True
E.21	Subscription period beginning	2025-09-01 (intended)
E.22	Subscription period end	2027-03-31 (intended) or when all GFT allocated for the offer are sold.
E.23	Safeguarding arrangements for offered funds/crypto-assets	greenkeeper GmbH has implemented effective safeguarding measures for funds and crypto-assets collected during the Public Offering period. During the Public Offering, all funds and crypto-assets received from purchasers will be securely monitored and safeguarded by one or more of the following entities: • A licensed credit institution, in cases where fiat funds are collected during the Public Offering.



		 A regulated crypto-asset service provider (CASP) that is authorized to hold and manage crypto-assets on behalf of clients. These safeguarding arrangements will remain in place until the expiration of the investor's right of withdrawal in accordance with MiCAR.
E.24	Payment methods for crypto-asset purchase	Purchasers wishing to acquire GFT during the Public Offering must complete the purchase through the designated greenkeeper GmbH sales platform. The acquisition process consists of the following steps:
		 Accessing the sales platform Purchasers have to register with an email address for further communication. Purchasers can connect a compatible self-custody EVM wallet via WalletConnect. Alternatively, purchasers may provide a cold wallet or a custodian wallet for Token allocation. Selection of purchase option Purchasers select the number of GFTs they wish to acquire based on availability in the current phase of the Public Offering. The price per Token is determined by the structured multi-phase offering model. Payment methods Accepted payment methods include:



		 ii. Potentially Fiat currency (EUR) via credit card and payment provider. b. Payment confirmation is required before Token allocation. 4. Finalization of purchase a. Once payment is received and verified, GFTs will be allocated to the purchaser's registered wallet. b. GFTs subject to vesting will be locked and gradually released according to the predefined vesting schedule.
		Purchasers must ensure that their wallet is compatible with the GFT standard and remains accessible for GFT distribution. Failure to complete any of the required steps may result in the cancellation of the purchase request.
E.25	Value transfer methods for reimbursement	Not applicable
E.26	Right of withdrawal	Purchasers participating in the Public Offering of GFTs have the right to withdraw their commitment during the specific offer period of the Public Offering phase in which they purchased Tokens, in accordance with Article 13 of Regulation (EU) 2023/1114 (MiCAR). The withdrawal period begins on the day the investor bindingly agrees to purchase GFT and ends at the end of 14 calendar days. It is irrelevant whether the withdrawal period ends on a weekday, a Sunday or a public holiday. Withdrawal is possible in any form and without giving reasons and can be addressed to the following e-mail address: support@greenkeeper.eco .



		Once a Public Offering phase has ended, the right of withdrawal for that phase expires, and commitments become final.
E.27	Transfer of purchased crypto-assets	GFTs purchased during the Public Offering will be transferred to the purchaser's designated wallet after the completion of the Public Offering and the TGE.
		 Wallet options Purchasers using self-custody wallets can connect their EVM-compatible wallet on the sales platform. Alternatively, purchasers may provide a cold wallet address or designate a custodian wallet for GFT allocation. GFT allocation timing GFT will be allocated after the Public Offering ends and the TGE takes place. Tokens subject to vesting will remain locked and will be released gradually according to the predefined schedule. Smart contract execution Transfers will be executed automatically via smart contracts. Failure to provide a valid wallet or maintain access may result in delays or inability to receive GFTs.



E.28	Transfer time schedule	The vesting schedule for GFT will commence at the TGE, which occurs earliest 15 days after the final Public Offering phase ends, depending on the readiness of the underlying CO ₂ -backed assets and technical deployment requirements. The specific timing depends on the availability and validation of the corresponding forest areas. Purchasers will be informed promptly of any delays and will have access to a tracking interface displaying the issuance progress of their GFTs. The transfer schedule for GFTs follows a structured release timeline to ensure smooth market integration and investor protection:
		 Early Backers (Private Sale): Tokens will be released with a 48-weeks vesting, starting from TGE. Public Offering Purchasers: Tokens will start unlocking after the TGE, and according to section E.8. Team & Advisor Allocations: None of the team members owns GFT unless purchased at their own expense during the Presale. Liquidity Reserve: Liquidity Tokens (10% of circulating supply) will be available immediately at TGE to ensure an efficient trading environment. Ecosystem Growth Reserve: GFTs will be released with a 48-weeks vesting, starting from TGE.
		Exact vesting periods and unlock conditions for each category are detailed in Section 10.1 and section E.8



E.29	Purchaser's technical requirements	Purchasers must provide a compatible wallet for receiving GFTs. The following wallet options are available:
		 Self-custody wallets a. Purchasers may connect their own EVM-compatible wallet via WalletConnect to ensure seamless interaction with the sales platform. Cold wallets a. GFTs can be allocated to cold wallets, provided the purchaser ensures compatibility with ERC-20 standard Tokens and transaction accessibility. Custodian wallets a. Institutional or managed custodian wallets can be designated for GFT allocation. Purchasers using custodian services must ensure that the wallet provider supports GFT deposits and withdrawals. It is the purchaser's responsibility to ensure access to the designated wallet for future transactions.
E.30	Crypto-asset service provider (CASP) name	Not applicable.
E.31	CASP identifier	Not applicable.
E.32	Placement form	WOUT (without a firm commitment basis)
E.33	Trading platforms name	Not applicable.



E.34	Trading Platforms Market identifier code (MIC)	Not applicable.	
E.35	Trading platforms access	Not applicable.	
E.36	Involved costs	Not applicable.	
E.37	Offer expenses Conflicts of interest	Expense Type Legal and Compliance Fees Marketing and Distribution Forest certification & Payment to forests Technical Infrastructure greenkeeper GmbH controls the majority of B2C sales activities for emission compensa Liquidity Reserve, which may present a conf	
E.39	Applicable	buybacks influence the market. German law, unless otherwise required by mandatory provisions of applicable	
	Applicable law	consumer protection or private internationa	
E.40	Competent court	The competent court for any legal disputes shall be the courts of Munich, Germany, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.	



F.1	Crypto-asset type	Under the MiCAR taxonomy, GFT is a crypto-asset other than e-money Token or asset referenced Token.	
F.2	Crypto-asset functionality	The GFT can be utilized on the greenkeeper platform to compensate for carbon emissions.	
F.3	Planned application of functionalities	The emission compensation functionality is active from the beginning of the public sale.	
F.4	Type of crypto-asset white paper	OTHR (Other)	
F.5	The type of submission	NEWT (New)	
F.6	The type of submission Crypto-asset characteristics	The GFT is a cryptographic utility Token designed for use within the greenkeeper ecosystem. The GFT does not represent an ownership interest, voting rights, or entitlement to revenue distribution from greenkeeper GmbH. 1. Name, symbol, and Token type a. Token name: greenfeetoken b. Token symbol: GFT c. Token standard: ERC-20 compliant, operating on EVM-compatible blockchains d. Blockchain: Base, public permissionless 2. Functionality and purpose	



		 a. Each GFT represents the right to compensate for one ton of CO₂ emissions. Token holders of the GFT can utilize it on the greenkeeper compensation platform to offset their private or corporate CO₂ emissions. b. The Token can only be utilized on the greenkeeper platform. c. GFT cannot be redeemed for fiat currency or other off-platform assets. 3. Transferability and usage a. GFTs can be freely transferred between compatible wallets. b. The Tokens will be listed on decentralized exchanges following the TGE and the establishment of a Liquidity Reserve. 4. Security and smart contracts a. The Token operates on audited smart contracts that facilitate transfers, staking, and discount validation. b. Smart contract security is reinforced through regular third-party audits and internal security protocols. 5. Future development and adaptability a. While the Token's current primary function is to be utilized for CO₂ emission compensation, greenkeeper GmbH reserves the right to introduce additional functionalities in compliance with regulatory requirements.
F.7	Commercial name or trading name	greenkeeper GmbH
F.8	Website of the issuer	https://greenkeeper.eco



F.9	Starting date of offer to the public or admission to trading	2025-11-01 (intended)
F.10	Publication date	2025-09-01
F.11	Any other services provided by the issuer	greenkeeper GmbH provides a self-service marketplace & registry for CO ₂ emission compensation. Customers can choose GFT from various climate projects in Germany and Europe and retire the Tokens themselves.
F.12	Language or languages of the crypto-asset white paper	EN (English)
F.13	Digital Token identifier code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	Digital Token Identifier: Not available (DTI to be provided upon availability)
F.14	Functionally fungible group digital Token identifier, where available	Not available



F.15	Voluntary data flag	False
F.16	Personal data flag	False
F.17	LEI eligibility	True
F.18	Home member state	DE (Germany)
F.19	Host Member States	The greenfeetoken will be offered in all Member States of the European Union: Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

Part G – Information on the rights and obligations attached to the cryptoassets

G.1	Purchaser Rights and	Purchasers of the GFT acquire property over the GFT, which includes the bundle of rights
		under the applicable legal systems (right to use, right to transfer, etc.). Holding the token
	Obligations	does not grant the holder any legal, contractual, or proprietary right to demand, take
		delivery of, or otherwise obtain the underlying physically stored ${ m CO_2}$ of the GFT.
		Purchasers of the GFT are entitled to utilize the GFT for CO ₂ emission compensation on
		the greenkeeper platform. For each utilized Token, a burning fee is charged to
		compensate for gas fees.
		The GFT does not confer any ownership, voting rights, or dividend entitlements within
		greenkeeper GmbH.



		Obligations are determined by the applicable legal system but there are no obligations intrinsic to the purchase of the GFT itself.
G.2	Exercise of Rights and Obligations	To exercise the right to compensate for CO_2 emissions, the holders must burn Tokens equal to their CO_2 emissions (in tons of CO_2).
		Example:
		The CO ₂ emissions of a company are 1000t for the fiscal year 2025. By purchasing 1000
		GFT and utilizing them on the greenkeeper platform, the company can claim a greenkeeper CO ₂ compensation certificate.
G.3	Conditions for modifications of rights and obligations	The rights and obligations associated with the GFT are determined at the time of purchase and burning. Any modifications to discount rates, staking requirements, or other Token-related conditions will apply exclusively to future burning agreements and will not affect Tokens that are already burned under pre-existing terms. Each burning event constitutes a separate contractual commitment.
G.4	Future public offers	Not applicable
G.5	Issuer retained crypto- assets	A portion of the GFT supply is retained by the issuer, following structured vesting schedules to ensure long-term commitment to the platform's development.
G.6	Utility Token classification	True
G.7	Key features of goods/services of utility Tokens	Each GFT represents the right to compensate for one ton of CO_2 emissions. Token holders of the GFT can utilize it on the greenkeeper compensation platform to offset their private or corporate CO_2 emissions. The purchase of a GFT directly financially supports Forests located across the geographic continent of Europe, including



		countries both inside and outside the European Union. By burning the GFT on the greenkeeper platform, it can be utilized to compensate for ${\rm CO_2}$ emissions and to receive a greenkeeper compensation certificate.
G.8	Utility Tokens redemption	Tokens utilized for emission compensation are burned and cannot be redeemed.
G.9	Non-trading request	True
G.10	Crypto-assets purchase or sale modalities	After the offer to the public, the greenfeetoken can be purchased or sold on designated decentralized exchanges.
G.11	Crypto-assets transfer restrictions	As long as not burned, there are no transfer restrictions on GFTs.
G.12	Supply adjustment protocols	False
G.13	Supply adjustment mechanisms	The maximum supply of GFT is 40.500.000 GFT. These Tokens are locked in the Global Reserve Pool. Every time new forests are certified, the certified amount of GFTs is transferred to the greenkeeper Pool. From here, they are available for purchase. On the other hand, utilizing GFT for CO_2 emission compensation includes GFT burning. Token burning leads to a decrease in total supply.
G.14	Token value protection schemes	False



G.15	Token value protection scheme description	Not applicable
G.16	Compensation schemes	False
G.17	Compensation scheme description	Not applicable.
G.18	Applicable law	German law, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.
G.19	Competent court	The competent court for any legal disputes shall be the courts of Munich, Germany, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.
Part H	— Information on th	e underlying technology
H.1	Distribution ledger technology (DLT)	The GFT is issued on Base, a Layer 2 network built on Ethereum using the OP Stack developed by Optimism. The Token complies with the ERC-20 standard, enabling compatibility with the Ethereum ecosystem, including wallets, smart contracts, and decentralized applications. Base is a public and permissionless network, allowing unrestricted access for users and developers. This ensures transparency, interoperability, and broad usability of the Token infrastructure.



Duete cale and to aboring	The GFT adheres to the ERC-20 Token standard as defined within the Ethereum
	ecosystem. This includes standardized functions for Token transfers, approvals, and
standards	balance management, enabling seamless integration with compliant wallets, custody
	providers, and decentralized applications. Smart contract code is publicly verifiable and
	deployed on a transparent and auditable infrastructure.
Tables de service d	Base utilizes the OP Stack, an open-source framework maintained by Optimism, to
rechnology used	implement an Optimistic Rollup architecture. This design allows for off-chain
	transaction execution with periodic submission of data to Ethereum for finality and data
	availability. The OP Stack ensures modularity, Ethereum compatibility, and scalability,
	while retaining full access to Ethereum's tooling and security assurances.
Canadananamadhaniam	Base does not operate its own consensus mechanism. Instead, it relies on Ethereum for
Consensus mechanism	settlement, finality, and security. Ethereum uses a Proof of Stake (PoS) consensus
	model, in which validators confirm transactions and secure the network. While Base
	currently uses a centralized sequencer operated by Coinbase to order transactions, the
	underlying infrastructure remains public and permissionless, and long-term
	decentralization of sequencing is anticipated within the rollup roadmap.
Incentive mechanisms and applicable fees	Users on Base pay Layer 2 transaction fees for execution and Layer 1 posting fees for
	data availability on Ethereum. These fees are significantly lower than on Layer 1 due to
	batching and compression.
	Fee structures may include:
	L2 execution fees
	L1 data posting fees
	 Application-specific service fees (e.g. Token issuance)



		Base lavarence the efficiency of the OB Cheek, while maintaining Ethernover and		
		Base leverages the efficiency of the OP Stack while maintaining Ethereum-grade security, ensuring scalability and economic sustainability for applications built on top.		
H.6	Use of Distributed Ledger Technology	False.		
H.7	DLT Functionality Description	Not applicable.		
H.8	Audit	False.		
H.9	Audit outcome	Not applicable.		
Part I –	Part I — Information on risks			
1.1	Offer-related risks	Issuer-related Risks: The value and functionality of GFT is directly tied to the actions and success of greenkeeper GmbH. If greenkeeper GmbH fails, ceases operations, or cannot maintain its platform and services, the GFT may lose its intended utility and could become worthless.		



Financial Stability and Operational Risks:

The financial value of GFT is correlated to the price of one ton of CO_2 on the voluntary carbon market. However, all issued and sold GFTs can be utilized for CO_2 compensation on the platform of the greenkeeper GmbH. If EU regulation and taxonomy change or the company faces liquidity shortages, funding difficulties, or rising operational costs, it may impact the platform's development and service continuity, thereby reducing the Token's usability and demand.

Dependence on Key Personnel:

The success of greenkeeper GmbH heavily relies on its leadership and technical expertise. The loss of key personnel – especially those in executive or technology roles – could disrupt operations and impact the company's ability to meet its commitments. A lack of succession planning could exacerbate this risk.

Strategic and Business Model Risks:

If greenkeeper GmbH fails to align its business model with market trends, it may experience reduced platform adoption, negatively affecting the demand and utility of the GFT.

Risk of Competitors:

Other companies may replicate or improve upon greenkeeper GmbH's business model, potentially reducing its market share. Increased competition could limit platform adoption.



Regulatory Compliance and Legal Risks (MiCAR Compliance):

As the issuer of a utility Token, greenkeeper GmbH must comply with Markets in Crypto-Assets Regulation (MiCAR) and other relevant financial regulations. Changes in regulatory frameworks specific to Token issuance, tokenized financial instruments, or financial services may impose additional compliance obligations, operational constraints, or legal risks. Regulatory non-compliance could impact the functionality of GFT and its market acceptance.

Custodial and Reimbursement Risks:

The GFT is primarily designed for self-custody, meaning purchasers are responsible for securing their assets. If Tokens are stored with third-party custodians, there is a risk of insolvency, security breaches, or operational failures affecting Token retrieval.

Additionally, reimbursement mechanisms mandated under MiCAR require proper execution, and delays or technical issues may affect timely refunds.

Vesting Risks:

Up to 10.000 GFTs are allocated to early equity investors, with a structured vesting period to ensure long-term alignment. However, potential risks include unforeseen departures, changes in management, or strategic misalignment, which could impact market confidence and Tokenholder trust. Note that no team member owns GFT unless purchased at their own expense during the Public Offering.

Price Risk and Token Allocation:



The Public Offering comprises only a fraction of the total GFTs in circulation. A significant portion of GFTs was allocated at earlier, lower prices (or for free), which could impact price stability. Any large-scale sales by early holders after vesting periods could create downward pressure on the Token price. In contrast to other Token projects, each issued Token has a real generation price. Therefore, the costs of the issuance of each GFT must be covered by the sales price.

Liquidity and Listing Risks:

While GFT will be listed on a Crypto Exchange, listing does not guarantee active market participation or liquidity. Purchasers may experience difficulty in selling their GFT at desired prices due to no or low trading volumes or price slippage.

Risk of Conflicts of Interest:

greenkeeper GmbH retains a significant portion of GFTs for ecosystem development and liquidity provision. The company's decisions regarding GFT sales, strategic reserves, or buybacks may impact the market price and investor confidence.

Management and Governance Risks:

Poor strategic decisions, lack of governance oversight, or mismanagement of financial and operational resources could affect the long-term viability of greenkeeper GmbH and, consequently, the GFT. In an extreme case, insolvency of greenkeeper GmbH could render the GFT non-functional.



		Reputation Risk:
		Negative publicity, legal disputes, regulatory investigations, or service failures could
		impact the reputation of greenkeeper GmbH, leading to loss of confidence in the
		platform and the GFT. A deterioration in public perception may reduce demand and
		adoption of the Token.
1.2	Issuer-related risks	Not applicable, as the issuer is the same as the offeror (see I.1).
1.3	Owner contains and the winter	The GFT, as a utility Token, is subject to various risks that may affect its valuation,
	Crypto-assets-related risks	liquidity, security, regulatory status, and overall usability. The following risks outline key
		factors that could impact the GFT and its holders.
		Market Volatility:
		The market price of GFT (if any) may fluctuate significantly due to demand within the
		greenkeeper platform and broader crypto-market conditions. Volatility may result from
		external economic factors, regulatory changes, or shifts in investor sentiment. These
		fluctuations can cause the GFT price to drop and even become worthless within a very
		short period of time.
		Limited Fungibility and Trading Risks:
		At the time of the Public Offering of GFTs, there is no established market price, as the
		GFTs will not be immediately listed on an exchange. The Token is planned to be listed on
		a Crypto Exchange after the Token Generation Event (TGE). However, there is no
		guarantee of sufficient liquidity or trading volume, which could impact the ability of
		holders to sell or trade GFTs at desired prices. Additionally, price discovery in early



trading phases may be subject to high volatility, price slippage, and potential market manipulation.

Limited Utility and Usability Outside the Platform:

By burning the GFT on the greenkeeper platform, it can be utilized to compensate for CO₂ emissions and to receive a greenkeeper compensation certificate.

The prices for Token burning are determined directly by greenkeeper GmbH. While GFT Tokens will be freely transferable after vesting, their value and demand are directly tied to platform adoption and are correlated to prices on the carbon market. A decline in user engagement due to changing regulation & taxonomy could reduce GFT demand. The GFT is not redeemable for fiat currency within the platform, and its usability in external ecosystems remains limited.

Blockchain Security Risks:

As a blockchain-based asset, the GFT is exposed to cybersecurity risks, including hacking, data breaches, or smart contract vulnerabilities. If the underlying smart contracts contain flaws, they could be exploited by malicious actors, leading to financial losses for Token holders. Despite security audits, unforeseen vulnerabilities could still pose risks to Token security and functionality.

Jurisdictional Restrictions:

Regulations regarding crypto-assets vary across different jurisdictions. Some countries may impose restrictions on the trading, holding, or usage of GFTs. Purchasers must



		ensure that they comply with local legal requirements before acquiring or using the
		Token.
		In a section and Market Balanana Bisks
		Innovation and Market Relevance Risk:
		The blockchain and tokenization industry is evolving rapidly. Emerging technologies,
		new regulatory frameworks, or competitive solutions may affect the long-term relevance
		of the GFT. If greenkeeper GmbH fails to continuously adapt to industry trends, the GFT value and demand may decline over time.
		value and demand may decime over time.
		Lack of Ownership or Governance Rights:
		Holding GFTs does not grant equity, voting rights, or decision-making control over
		greenkeeper GmbH. Token holders have no influence over business strategies, pricing
		models, or platform governance. Changes to platform fees, services, or GFT utility may
		occur without direct input from GFT holders.
1.4		Development and Deployment Risk
	Project implementation-	The success of the GFT depends on the effective and timely development of the
	related risks	greenkeeper platform. Delays in development, unforeseen technical challenges, or
		failure to implement planned features could negatively affect the platform's ability to
		deliver services as intended. If core functionalities are not developed or deployed as
		planned, the GFT utility may be diminished.
		Scalability and Performance Risk



As adoption of the greenkeeper platform increases, scalability and performance limitations may emerge. High transaction volumes or unexpected demand surges could lead to network congestion, slower processing times, or degraded platform performance. These issues could limit the usability of the GFT, affecting user experience and overall market confidence.

Dependence on External Partnerships and Service Providers

greenkeeper GmbH relies on third-party service providers and technology partners for critical functions, including blockchain infrastructure, liquidity provision, and regulatory compliance services. Failures, security breaches, insolvency, or operational issues affecting these external providers could disrupt platform services, impacting the utility and availability of the GFT.

Funding Risks

The further development and maintenance of the greenkeeper platform require sufficient financial resources. greenkeeper GmbH depends on revenues from platform services, external funding, and market adoption. Economic downturns, reduced investor confidence, or unexpected financial challenges could impact the company's ability to sustain platform operations and technological advancements. If greenkeeper GmbH is unable to secure sufficient funding, it may be forced to scale back platform development, reducing the GFT's long-term viability.

Technological and Integration Risk



		Integrating blockchain-based infrastructure with existing financial and legal systems presents technological and compatibility challenges. Changes in blockchain protocols, security vulnerabilities, or unforeseen technical constraints could delay or restrict platform features, directly affecting the usability of the GFT.
1.5	Technology-related risks	Regulatory Compliance for Project Implementation New regulatory requirements or changes in interpretation could impose additional compliance burdens on greenkeeper GmbH. This may include restrictions on GFT offerings, modifications to GFT-based services, or new licensing requirements. Noncompliance with these regulations could lead to penalties, service limitations, or operational restrictions, all of which could affect the functionality and marketability of the GFT. Blockchain and Smart Contract Vulnerability The GFT's smart contracts are susceptible to coding vulnerabilities, bugs, or security flaws that could be exploited by malicious actors. A breach in the smart contract could result in unauthorized transactions, GFT loss, or manipulation of staking mechanisms, affecting the GFT's security and trust among holders. Even though security audits are conducted, unforeseen vulnerabilities may still pose a risk.
		Cybersecurity and Data Breach Risks As a blockchain-based asset, the GFT is exposed to cybersecurity threats such as hacking, phishing attacks, and data breaches. If attackers compromise greenkeeper GmbH's infrastructure or the wallets of Token holders, this could result in financial losses, operational disruptions, and reputational damage.



Dependency on Underlying Blockchain Stability and Performance

The GFT operates on the Base blockchain (ERC-20 standard), meaning its functionality depends on the stability and efficiency of this network. Risks include:

- Network congestion, which may lead to higher transaction fees or slower confirmation times.
- Technical failures, blockchain reorgs, or forks, which could impact Token transfers and staking mechanisms.
- Reliance on third-party validators and node operators, which may introduce security vulnerabilities or service disruptions.

Wallet and Private Key Risk

GFT holders are responsible for the custody of their Tokens in a compatible cryptographic wallet and for securing their private keys. Loss of a private key means permanent loss of access to the GFTs, with no possibility of recovery. If a holder connects their wallet to malicious applications or platforms, they risk unauthorized access to their assets.

Technology Obsolescence Risk

Blockchain technology is rapidly evolving. If greenkeeper GmbH's platform does not adapt to new standards, interoperability solutions, or emerging security protocols, the GFT's utility and competitive relevance may diminish over time. New blockchain innovations could introduce more efficient Tokenization models, potentially reducing demand for the GFT.



		Risk of Technical Failures and Downtime
		Technical issues, such as server outages, software bugs, or API failures, could lead to
		platform downtime, transaction delays, or staking errors. If prolonged, such failures may
		disrupt user confidence and limit access to the GFT's functionality.
		Data Privacy and Compliance Risk
		greenkeeper GmbH processes user data in compliance with applicable data protection
		laws, such as the General Data Protection Regulation (GDPR). Failure to adequately
		protect user information could lead to regulatory penalties, loss of user trust, and
		potential restrictions on platform operations. Any data breaches or non-compliance
		with privacy regulations may impact the long-term adoption of GFT-based services.
1.6	Mitigation maggures	Smart Contract Audits and Security Measures
	Mitigation measures	All smart contracts related to the GFT will undergo an independent security audit before
		the TGE. These audits aim to identify and mitigate vulnerabilities in the code, ensuring
		the secure execution of transfer and burning mechanisms. Regular internal security
		reviews and updates will be conducted to maintain the integrity of smart contracts.
		Cybersecurity Framework
		greenkeeper GmbH will implement a multi-layered cybersecurity strategy, including
		encryption, regular security assessments, and robust access control measures.
		Protection against phishing attacks, malware, and unauthorized access is prioritized to
		safeguard both platform operations and user assets.



ISO 27001 Certification and Information Security Compliance

greenkeeper GmbH is in the process of obtaining ISO 27001 certification, which is expected to be completed before the end of the Public Offering. This certification ensures adherence to internationally recognized information security management standards, including risk assessment, data protection, and cybersecurity resilience.

Incident Response and Contingency Planning

A structured incident response plan will be in place by the TGE to address potential security breaches, smart contract failures, and operational disruptions. This includes predefined escalation procedures, forensic analysis protocols, and corrective action mechanisms to minimize potential damages.

Compliance with Regulatory Standards

The GFT is issued under the Markets in Crypto-Assets Regulation (MiCAR) framework and aligns with applicable EU regulations for crypto-assets. Compliance measures include monitoring regulatory developments, implementing necessary legal adjustments, and ensuring adherence to financial and anti-money laundering (AML) obligations.

Blockchain Stability and Redundancy Measures

To mitigate risks associated with blockchain network congestion or disruptions, the GFT is issued on the Base blockchain, an Ethereum Layer-2 solution with high transaction efficiency. The platform maintains contingency protocols to address potential forks, blockchain failures, or network security concerns.



Private Key and Custody Risk Awareness

greenkeeper GmbH provides guidance and educational materials to users on securing their wallets and private keys. The platform supports wallet connection mechanisms, reducing the risk of manual errors when entering wallet addresses. While greenkeeper GmbH does not offer custodial services, users are encouraged to adopt secure storage solutions such as hardware wallets or trusted third-party custodians.

Governance and Internal Risk Management

To address risks related to financial stability, operational continuity, and strategic decision-making, greenkeeper GmbH will establish internal governance structures and risk monitoring frameworks. Key areas of focus include liquidity management, revenue planning, and continuous evaluation of business risks.

Vesting Mechanisms for Team and Early Backers (Private Sale)

To align the interests of key stakeholders with the long-term success of the GFT, a structured vesting schedule has been implemented. Advisor grants, and early backer distributions are subject to predefined vesting periods to prevent excessive Token supply from entering the market at once. This mechanism reduces short-term price volatility and ensures that contributors remain engaged with the project. The vesting schedule provides gradual Token unlocks over a set period, mitigating risks related to sudden Token dumps and ensuring a sustainable market. No team member owns GFT unless purchased at their own expense during the Public Offering.



Continuous Market Monitoring and Ecosystem Adaptation The greenkeeper platform actively monitors market conditions, technological advancements, and competitive developments to ensure long-term relevance. Adjustments to platform features, pricing models, and Token utility will be made in response to evolving industry trends and regulatory requirements. Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts Information referred to Commission Delegated Regulation (EU) 2025/422 with regard to J.1 Adverse impacts on regulatory technical standards specifying the content, methodologies and presentation climate and other



	environment-related adverse impacts	of information in respect of sustainability indicators in relation to adverse impacts on the climate and other environment-related adverse impacts (see S.1 – S.36)
	atory information on princip d adverse impacts of the co	al adverse impacts on the climate and other environment- nsensus mechanism
N	Field	Content
Genera	l Information	
S.1	Name	greenkeeper GmbH
S.2	Relevant legal entity identifier	
S.3	Name of the crypto assets	greenfeetoken (GFT)
S.4	Consensus Mechanism	N/A. GFTs do not have their own consensus mechanisms. GFT's consensus mechanism relies on its base layer, Base is an L2 network which also does not have a consensus mechanism (it leverages the OP Stack) but relies on Ethereum as its own base layer, ultimately utilising a Proof of Stake (PoS) consensus mechanism.
S.5	Incentive Mechanisms and Applicable Fees	N/A. GFTs do not have incentive mechanisms to secure transactions nor associated fees, as this is handled by the base layers.



S.6	Beginning of the period to which the disclosure relate	N/A as this Token has not yet been minted
S.7	End of the period to which the disclosure relates	N/A as this Token has not yet been minted
	Ma	andatory key indicator on energy consumption
S.8	Energy consumption	0,36829 kWh per calendar year
S.9	Energy consumption sources and methodologies	http://www.micacryptoalliance.com/methodology
	Supplem	nentary key indicators on energy and GHG emissions
S.10	Renewable energy consumption	0,3431249554
S.11	Energy intensity	0,0000013423 kWh per transaction
S.12	Scope 1 DLT GHG emissions – controlled	0,00 t CO ₂ eq per calendar year
S.13	Scope 2 DLT GHG emissions – purchased	0,00012 t CO ₂ eq per calendar year
S.14	GHG Intensity	0,0000004474 kg CO₂eq per transaction



		Sources and methodolog	ies
S.15	Key energy sources and methodologies	http://www.micacryptoalliance.com/methodology	
S.16	Key GHG sources and methodologies	http://www.micacryptoalliance	e.com/methodology
	nal information on the prind d adverse impacts of the co	•	the climate and on other environment-
N	Field	Content	
	,	Optional Indicators	
S.17	Energy mix		
		Energy source	Percentage {DECIMAL-11/10}
		Lifetgy doubte	Teroentage (DEON IAL 117 10)
		Bioenergy	0,0327551658



	Gas	0,3130247892
	Hydro	0,0963914923
	Nuclear	0,1323794138
	Other Fossil	0,0273465295
	Other Renewables	0,0026209419
	Solar	0,0610944953
	Wind	0,1502628600
Carbon intensity	0,33330 kg CO ₂ eq per kWh	
Generation of waste electrical and electronic equipment (WEEE)	0,000000805 t per calendar year	
Non-recycled WEEE ratio	0,6055006672	
Generation of hazardous waste	0,000000004 t per calendar year	
Generation of waste (all types)	0,000000805 t per calendar year	
Non-recycled waste ratio (all types)	0,6055006672	
	Generation of waste electrical and electronic equipment (WEEE) Non-recycled WEEE ratio Generation of hazardous waste Generation of waste (all types) Non-recycled waste ratio	Hydro Nuclear Other Fossil Other Renewables Solar Wind Carbon intensity Generation of waste electrical and electronic equipment (WEEE) Non-recycled WEEE ratio Generation of hazardous waste Generation of waste (all types) Non-recycled waste ratio O,00000000000000000000000000000000000



S.27	Waste intensity (all types)	0,0000002935 g per transaction
S.29	9 Impact of the use of equipment on natural resources	Land use: 0,89491 m ²
S.31	Water use	0,00158 m ^d per calendar year
S.32	Non-recycled water ratio	0,7228903252
S.33	Key energy sources and methodologies	http://www.micacryptoalliance.com/methodology
S.34	Other GHG sources and methodologies	http://www.micacryptoalliance.com/methodology
S.35	Waste sources and methodologies	http://www.micacryptoalliance.com/methodology
S.36	Natural resources sources and methodologies	http://www.micacryptoalliance.com/methodology