BLOCKBEN

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I.01: Date of notification

2025-12-04

I.02: Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114

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

I.03: Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114

This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto- asset white paper makes no omission likely to affect its import.

I.04: Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114

The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.

I.05: Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114

The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.

I.06: Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114

The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. 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.

Summary	
I.07: Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	Warning: This summary should be read as an introduction to the crypto- asset white paper. The prospective holder should base any decision to purchase this crypto – asset on the content of the crypto- asset white paper as a whole and not on the summary alone. The offer to the public of this crypto- asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.
I.08: Characteristics of the crypto-asset	The CrowdX (CRDX) token is a utility token issued by BlockBen SIA designed to enhance user engagement and streamline transactions within the CrowdedHero platform—a leading equity crowdfunding platform connecting investors with high-potential companies. The token is not an investment and does not carry any ownership, profit-sharing, or governance rights. Purchaser Rights and Obligations: • Purchasers of CRDX tokens are entitled to a range of exclusive rights and benefits within the CrowdedHero ecosystem. CRDX can be used as an alternative means of payment for services and fees instead of EUR, reinforcing its role as a utility token. In addition, CrowdedHero buyers who have completed a purchase and are not yet BlockBen customers are eligible to receive a bonus upon registering a BlockBen wallet, thereby incentivizing wallet adoption. Once they become CRDX holders, further purchases may also qualify them for the associated token-holder benefits. Token holders additionally enjoy early and exclusive access to new investment opportunities, priority customer support, and potential discounts on both the platform and transaction fees. These utilities are designed to encourage active participation, foster long-term engagement, and strengthen the overall value proposition of the CRDX token. • Retail purchasers have the right to withdraw from the purchase within 14 calendar days, in line with MiCAR regulations. • Token holders are required to maintain a verified BlockBen Wallet and follow KYC procedures. • CRDX tokens are not transferable during the pre-sale period. How to Exercise Rights: • Withdrawal rights must be exercised via email or the platform interface within 14 days of purchase. • Redemption of tokens is done through the BlockBen Wallet, or by selecting available projects and confirming the transaction, by referring the transaction number received on the crowdedhero.com and confirming the transaction Modifications to Rights or Obligations: • BlockBen may modify token-related rights or platform access due to regulatory updates, platform upgrades, or service adjustments. • Any material changes will be communicated to purchasers

	in advance via the BlockBen website, wallet interface or via email, and in some cases, may re-trigger withdrawal rights.
I.09.: Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114.	The issuer declares that, to the best of its knowledge, the information contained in this crypto-asset white paper is fair, clear, and not misleading, and that it contains all material information necessary for prospective holders of the crypto-assets to make an informed decision, in accordance with Article 6(5)(d) of Regulation (EU) 2023/1114)
I.10: Key information about the offer to the public or admission to trading	CrowdX (CRDX) is offered to the public by BlockBen SIA. It provides access to exclusive investment opportunities, priority customer support, and fee discounts via the BlockBen platform. Token Supply & Pricing: • Total token supply: 11,600,000 CRDX • Initial issue price: 0.26 EURC per token • The price increases daily by 0.25%, reflecting growing access demand and token utility • No additional subscription fees apply Subscription Period & Offer Phases: • The public offer will begin on 10 January 2026 under BlockBen SIA (Latvia). • Pre-sale Phase: Purchasers receive tokens in their BlockBen Wallet accounts immediately, but tokens remain non-transferable • Post-sale Phase: Transfer and potential trading functionality will be activated once the pre-sale and withdrawal periods are completed Eligible Purchasers: • The offer is open to retail and professional clients across the EU, subject to KYC/AML verification Offering Structure: • Tokens are distributed exclusively via the BlockBen Wallet, operated by BlockBen SIA

Part A - Information about the offeror or the person seeking admission to trading	
A.1: Name	QUEST2SEEK - UNIPESSOAL LDA
A.2: Legal form	Limited Company
A.3: Registered address	Rua de Sá da Bandeira, Nr 706 , 3 D 4000-432 Porto, Portugal
A.4: Head office	Rua de Sá da Bandeira, Nr 706 , 3 D 4000-432 Porto, Portugal
A.5: Registration Date	
A.6: Legal entity identifier	N/A
A.7: Another identifier required pursuant to applicable national law	N/A
A.8: Contact telephone number	+351 2211558241
A.9: E-mail address	pcerqueira@live.com.pt
A.10: Response Time (Days)	(1} one working day
A.11: Parent Company	N/A
A.12: Members of the Management body	

Name	Position	Business address
Paulo Cerqueira	CEO	Rua de Sá da Bandeira, Nr 706 , 3 D 4000-432 Porto, Portugal

A.13: Business Activity	QUEST2SEEK-UNIPESSOAL LDA (QUEST2SEEK), operating under a licensing agreement with CrowdedHero Latvia SIA—an equity crowdfunding platform founded in Latvia in 2019, an equity crowdfunding platform founded in Latvia, 2019, offering an institutional-grade, investor-friendly avenue for funding and

investing in both early-stage startups and more mature, growth-stage companies. It brings a "grown-up" approach to equity-based financing, leveraging deep market expertise to deliver high-potential opportunities that were once exclusively available to venture capital and institutional investors. These unique opportunities marketed and sold through a dedicated digital platform where purchases can be made using the CrowdX Token.

Corporate & Technological Structure: CrowdX is not a standalone initiative. It is part of a broader ecosystem supported by CrowdedHero SIA. The project benefits from a deeply integrated technological and operational structure:

- QUEST2SEEK: Manages token issuance and digital asset operations, ensuring compliance with digital asset regulations and driving token utility development.
- CrowdedHero Latvia SIA acts as the operational company and revenue source of the ecosystem. It allocates 7,1% of its worldwide revenue toward token buyback and burning mechanisms, thereby supporting value appreciation and long-term scarcity of the CrowdX tokens.

CrowdedHero Latvia SIA, founded in 2019 in Riga, operates as a licensed European equity crowdfunding platform. Its core activity is to connect private and institutional investors with high-growth companies by providing a transparent, professionally managed marketplace. The platform applies rigorous due diligence and regulatory compliance (ECSP license), offers access to both early-stage and mature companies, and enables participation starting from as little as €100.
CrowdedHero differentiates itself through an investor-friendly model, including dividend distributions, structured exit opportunities, and a transparent, performance-based fee structure. Investments can be made either directly or via Special Purpose Vehicles (SPVs), enhancing flexibility and investor protection.

Strategic Integration with BlockBen: BlockBen SIA serves as the platform owner, providing a compliant and secure ecosystem for token sales, user onboarding (with AML/KYC compliance), and transactional infrastructure.

This partnership enables the seamless integration of traditional equity crowdfunding services and blockchain-based digital asset management under MiCAR-compliant operations. Through this collaborative model involving innovation, regulatory compliance, and strategic corporate partnerships, CrowdX is positioned at the forefront of next-generation digital finance and investment platforms.

A.14: Parent Company Business Activity	N/A
A.15: Newly Established	True
A.16: Financial condition for the past three years	N/A As QUEST2SEEK was recently established, there is no historical financial data available for the past three years.
A.17: Financial condition since registration	QUEST2SEEK is the official offeror of the CrowdX utility token, overseeing the public sale and all related commercial activities. No previous financial data *Clarifying Roles: QUEST2SEEK (Offeror) vs. CrowdedHero SIA (Crowdfunding platform provider)* While the QUEST2SEEK is responsible for offering the token to the public, the underlying technology, services, and infrastructure for CrowdX are developed and operated by CrowdedHero Latvia SIA, a

separate entity. CrowdedHero does not participate in the token offering; rather, it provides the core investment platform, regulatory compliance framework, and investor-facing services on which the CrowdX ecosystem is built.

This structure ensures clear functional separation:
- QUEST2SEEK manages token offering and regulatory positioning.
- CrowdedHero provides the core investment platform, regulatory compliance framework, and investor-facing services

Strategic and Non-Financial Indicators (CrowdedHero)

To contextualize the offering within a broader ecosystem of stability and growth, the following non-financial indicators from CrowdedHero are noteworthy:

Technological Innovation

CrowdedHero is actively developing and integrating cutting-edge solutions across its crowdfunding ecosystem. Key innovations include:

- Implementation of DLT (Distributed Ledger Technology) via licensed partner Cashlink, enabling digital ownership registration, cross-platform visibility, and future secondary trading.
- Integration of AI-based investor targeting tools, including smart email automation and lead generation, tested for scaling investor acquisition.
- Continuous improvements to platform UX/UI and onboarding processes to match retail investor expectations for speed and simplicity.

Strategic Partnerships

CrowdedHero has built a growing network of strategic collaborations that support growth and credibility:

- Cashlink (Germany) – for tokenized fixed-income product issuance with full DLT infrastructure.
- ERSTE Finance (Latvia) – licensing of CrowdedHero's platform for their investment offering.
- Lemonway (France) – licensed European payment provider ensuring secure and compliant transaction processing.
- Expanding affiliate networks in Asia and MENA, opening new investor pipelines beyond the EU.

Scalable Production Infrastructure

CrowdedHero operates a lean, cloud-based infrastructure:

- Backed by Microsoft Azure, maintained via partner Edarin, ensuring reliability, scale, and regulatory alignment.
- In-house development team enables fast iteration and customization.
- Platform is modular and white-label-ready, as demonstrated by licensing to third parties (e.g., ERSTE Finance).
- Designed for high scalability across jurisdictions and languages (already supports EN, DE, LT; PL and CZ coming).

Governance and Regulatory Readiness

- CrowdedHero is a fully licensed ECSP (European Crowdfunding Service Provider), with strong emphasis on compliance and transparency:
- Licensed under ECSPR (license number 06.15.01.806/120, issued 16.08.2022, Latvia).
- Regular audits and financial reviews are performed internally and

	overseen by legal and accounting partners.

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	TRUE
B.2: Name	BlockBen SIA
B.3: Legal form	Limited Liability Company (SIA); ELF Code: ES2D
B.4: Registered address	Krišjāņa Valdemāra iela 21-11, Riga, LV-1010, Latvia
B.5: Head office	Krišjāņa Valdemāra iela 21-11, Riga, LV-1010, Latvia
B.6: Registration Date	2025-05-20
B.7: Legal entity identifier	254900BBV7FA7LUG5913
B.8: Another identifier required pursuant to applicable national law	N/A
B.9: Parent Company	N/A

B.10: Members of the Management body	Name	Position/Function	Business Address
	Viktor Mark Bodnar	Chairman of the Management Body	Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)
	Attila Krocsek	Member of the Management Body	Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)
	Luize Berzina	Member of the Management Body, responsible for AML function	Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)

B.11: Business Activity	BlockBen SIA is a Latvia-based entity primarily focused on delivering business-to-business (B2B) digital asset services. Its core activity is to support third-party clients in the issuance, administration, and lifecycle management of their crypto-assets within a secure, compliant infrastructure aligned with Regulation (EU) 2023/1114 (MiCAR).
	BlockBen operates a proprietary digital wallet and hybrid blockchain infrastructure (Natrix), designed to host, manage, and facilitate internal transfers of both third-party tokens and BlockBen's own crypto-assets, such as utility and asset-linked tokens issued on the platform.
	The BlockBen Wallet functions as a closed, permissioned environment. It is not interoperable with public or open blockchains and does not support external token custody. This architecture ensures enhanced regulatory compliance, robust transaction control, and strict adherence to AML/CFT obligations.
	In addition, BlockBen SIA facilitates fiat-to-crypto conversion services, enabled through partnerships with licensed EU financial institutions. All platform services are provided under comprehensive legal and compliance oversight, ensuring conformity with applicable financial and data protection frameworks.
B.12: Parent Company Business Activity	N/A

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

N/A

Part D - Information about the crypto-asset project

D.1: Crypto-asset project name	CrowdX
D.2: Crypto-assets name	CrowdX
D.3: Abbreviation	CRDX
D.4: Crypto-asset project description	CrowdX is a crypto-asset issued on the BlockBen platform, designed to provide utility within the CrowdedHero ecosystem by granting holders the ability to use CRDX tokens for payments, earn registration

	bonuses, and access early investment opportunities, priority support, and potential platform and transaction fee discounts.
D.5: Details of all natural or legal persons involved in the implementation of the crypto-asset project	BlockBen SIA is the issuer of CrowdX as of the date of this whitepaper. QUEST2SEEK is the official offeror of the CrowdX utility token. It is responsible for the public offering, sales, and related commercial activities, including marketing, partnership management, and community development within the CrowdX ecosystem. CrowdedHero SIA serves as the crowdfunding platform and technology partner. It is responsible for providing the operational infrastructure, investor-facing services, and regulatory compliance framework that form the functional basis of the utility token.
D.6: Utility Token Classification	TRUE
D.7: Key Features of Goods/Services for Utility Token Projects	CrowdX grants holders access to • CRDX tokens can be used as an alternative payment method for services and fees in the CrowdedHero ecosystem instead of EUR. • CrowdedHero purchasers who newly register a BlockBen wallet are eligible for a registration bonus. • CRDX holders are granted early and exclusive access to new investment opportunities within the CrowdedHero platform and may be eligible for additional benefits on subsequent purchases. • Priority customer support at CrowdedHero • Potential discounts on platform services and transaction fees. These goods and services are available solely within the BlockBen platform and cannot be used as a general-purpose payment instrument.
D.8: Plans for the token	Past Milestones • A formal contract between BlockBen and CrowdedHero for the CrowdX Token has been executed and is now in effect. • The structuring and development of the token has commenced, establishing the foundation for its utility and ecosystem integration. • The project has no other past milestones, as CrowdX is scheduled for launch on 10 January 2026. Future Milestones • Launch DLT-based bond product with Cashlink & cross-platform sharing • Reach operational break-even and raise €1.6M for scaling • Expand to Poland and Czech Republic with localized campaigns During 2026 • Launch DLT-based secondary market for investor exits • License platform to 3 external partners (EU or MENA) • Prepare Series A (7–10M EUR) and expand to 2+ new countries • Listing the token on exchanges
D.9: Resource Allocation	Financial Resources BlockBen allocates dedicated financial resources to support the development, issuance, and management of the CRDX token. This includes funding for product development, platform integration within the BlockBen Wallet, and MiCAR-related legal and regulatory compliance. Human Resources A specialized team manages the project, including product

	managers, compliance officers, legal advisors, and operations staff responsible for user support and token lifecycle oversight. Technological Resources CRDX operates on BlockBen's secure, closed blockchain infrastructure. Resources are allocated to ensure platform reliability, user access, and secure token operations, aligned with MiCA and DORA principles. Operational Resilience BlockBen maintains business continuity measures and cybersecurity safeguards to support uninterrupted access to CRDX-related services and the timely delivery of associated physical products. Product Innovation Ongoing efforts are focused on developing new partnerships and improving the user experience within the CrowdX ecosystem. Third-Party Services BlockBen collaborates with vetted partners for production and regulatory advisory to ensure compliant and efficient operations. Marketing BlockBen dedicates targeted marketing resources to support brand awareness and user acquisition for the CrowdX platform and the CRDX token. These efforts include cross-channel promotional campaigns such as digital advertising, and community engagement initiatives. In addition, BlockBen develops educational content and organizes events to communicate the token's utility, security features, and the value of its services. All marketing activities are adapted to regional requirements to ensure full compliance with local advertising regulations and MiCAR disclosure obligations.
D.10: Planned Use of Collected Funds or Crypto- Assets	Funds raised through the offer will be used by the Offeror to: - Expand into new EU markets (Poland, Czech Republic) with localized campaigns - Implement DLT-based bond infrastructure via licensed partner (Cashlink) - Develop AI-powered investor onboarding and communication tools - Support operational growth, including marketing and project acquisition - Prepare platform for white-label licensing and international scalability The Issuer will allocate funds toward: - Maintaining and developing the digital infrastructure for token operations, including the underlying blockchain and wallet integration; - Ensuring regulatory compliance, including monitoring, transaction oversight, and whitepaper updates; - Supporting user onboarding and secure custody of tokens, aligned with applicable financial and AML/CFT regulations. This offer is not intended to raise capital for unrelated financial investments but to directly support the utility-based operations of the CrowdX ecosystem. While BlockBen SIA is the MiCA-compliant issuer of the CrowdX utility token, the Offeror, QUEST2SEEK, is contractually appointed by the Issuer to perform defined commercial functions in the CrowdX

project, including marketing, distribution, and operational execution of utility-related services.

The Offeror does not act independently to place crypto-assets on a professional basis. Instead, it operates under the oversight and authorization of the Issuer, in accordance with a Business Cooperation Agreement (or equivalent governance document), which:

- Authorizes QUEST2SEEK to perform utility execution roles linked to the token's real-world product functionality;
- Defines the revenue-sharing or fund-allocation mechanics, ensuring that any proceeds received or handled by the Offeror are part of a pre-agreed operational budget;
- Preserves regulatory accountability within the Issuer, which remains responsible for compliance with MiCAR obligations, whitepaper updates, transaction monitoring, and end-user protection.

Therefore, QUEST2SEEK's involvement does not constitute unauthorized placement of crypto-assets. Rather, it is acting as an operational partner, engaged in deploying funds to fulfill the utility function of the token (e.g., product services, delivery, customer support), under a framework defined and governed by the regulated Issuer.

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	OTPC – offer to the public
E.2: Reasons for Public Offer or Admission to trading	The public offer of the CrowdX (CRDX) Utility Token aims to promote adoption of the CrowdX ecosystem by providing token holders the ability to use CRDX for payments, receive registration bonuses, and gain early access to investment opportunities, priority support, and potential platform and transaction fee discounts. To complement this, the Offeror may also pursue Admission to Trading (ATTR) for the CrowdX token on regulated exchange platforms after the pre-sale phase. This step is being considered to: • Enhance token liquidity and accessibility beyond the platform; • Promote broader adoption and price transparency through fair market discovery; • Enable secondary market utility and usability of the token; • Support the token's evolving value proposition as the ecosystem matures;
E.3: Fundraising Target	N/A
E.4: Minimum Subscription Goals	N/A
E.5: Maximum Subscription Goal	11,6 million
E.6: Oversubscription Acceptance	False The total number of CrowdX (CRDX) Utility Tokens will be strictly limited to 11.6 million. Once issued, it will be technically and operationally impossible to allocate more tokens than this fixed supply. If subscription applications were to exceed the quantity of tokens that remain available for distribution (i.e., those not yet sold or reserved), such excess applications would be: • Rejected automatically, as there are no further tokens to allocate; • Any funds received beyond the available supply would be refunded in full to the applicants, using the original payment method, and subject to standard AML/CFT

	verification procedures; • No additional tokens will be created or released to meet excess demand.
E.7: Oversubscription Allocation	No additional tokens can be created, and oversubscription is not technically possible beyond the available token inventory.
E.8: Issue Price	0,26 EURC
E.9: Official currency or any other crypto- assets determining the issue price	EURC
E.10: Subscription fee	N/A
E.11: Offer Price Determination Method	The offer price of the CrowdX (CRDX) Utility Token is determined using a fixed initial pricing model with a programmed daily increment, based on a transparent and predictable formula. • The price will increases daily by 0.25%, this price escalation has been established to make sure that those buyers who decided to join the community at an earlier phase may benefit from a lower intial token price. • This progressive pricing structure reflects the increasing scarcity and value utility of the token as the project and product ecosystem evolve. Subsequent offerings or listing activities are conducted within the evolving regulatory and operational structure, including future alignment under the Latvian CASP license and MiCA-compliant framework.
E.12: Total Number of Offered/Traded Crypto- Assets	11,6 million CRDX
E.13: Targeted Holders	RETI

E.14: Holder restrictions	1. Age and Legal Eligibility
	
	• Holders must be at least 18 years old.
	• They must not be classified as a "Restricted Person", meaning individuals on international sanctions lists or those acting on behalf of such persons.
	
	2. KYC and AML Requirements
	
	• All CRDX holders are subject to full KYC. This includes providing identification documents and undergoing screening against international sanctions lists.
	• Without successful KYC, no transaction is permitted within the Blockben Wallet.
	
	3. Geographic and Regulatory Restrictions
	
	• All jurisdictions are eligible, except those categorized as prohibited or high-risk countries by BlockBen's AML framework.
	• This list aligns with EU-level sanctions and FATF advisories and is regularly updated by the MLRO and compliance function.
	• The whitepaper emphasizes that use or ownership must comply with local laws, and Blockben assumes no liability for violations of foreign regulatory environments.
	
	4. Use Restrictions
	
	• Holders must not use the tokens for any illegal activities, such as:
	    o Money laundering
	    o Terrorist financing
	    o Illegal gambling
	    o Blackmail, fraud, extortion, or ransom-related activities.

E.15: Reimbursement Notice	Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed 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 or if the offer is cancelled.

E.16: Refund Mechanism	If a purchaser exercises the right of withdrawal within 14 calendar days from the date of purchase, or if a refund is otherwise warranted, BlockBen SIA will initiate a secure refund process as follows: • Reimbursement Method: Refunds will be made using the same payment method used for the original purchase, unless otherwise agreed in writing with the purchaser. • Refund Currency: Refunds will be issued in EUR, regardless of whether the original payment was made in fiat or crypto (converted at the transaction rate at time of purchase, if applicable). • Refund Timeline: The refund will be processed within 14 calendar days from the date BlockBen is notified of the withdrawal or refund request. • Processing and Communication: o Purchasers will receive a Reimbursement Notice confirming the amount, method, and date of refund. o No refund fees or administrative deductions will be applied by BlockBen SIA. • Exceptions: Refunds may be denied or delayed if: o The request is submitted after the legal withdrawal period, o The user account is under review for AML/CFT concerns, o Required identity verification is incomplete or disputed.
E.17: Refund Timeline	If a valid withdrawal or refund request is received, BlockBen SIA will process the refund within 14 calendar days from the date the request is received and confirmed.
E.18: Offer Phases	• Pre-Sale: Scheduled to commence on 10 January 2026. • Public Sale and Redemption: Tokens will be available for purchase and redemption on authorized trading platforms following the pre-sale period.
E.19: Early Purchase Discount	No early purchase discount will be offered for the CrowdX (CRDX) Utility Token. All participants will have equal access to the token at the same terms during the public offering.
E.20: Time-limited offer	TRUE
E.21: Subscription period beginning	2026-01-10
E.22: Subscription period end	TBC at later stage
E.23: Safeguarding Arrangements for Offered Funds/Crypto-Assets	During the time-limited public offer of the CrowdX (CRDX) Utility Token, BlockBen ensures that all funds received from purchasers are securely held in segregated accounts with EU-based financial institutions. These accounts are separated from BlockBen's own operational funds and are used exclusively for processing token purchases and potential withdrawals during the offer period. In addition internal controls and transaction logs are maintained to ensure traceability and fund integrity. The safeguarding process complies with the principles of customer fund protection outlined in MiCA Article 10.
E.24: Payment Methods for Crypto-Asset Purchase	in exchange for cryptocurrency (EURC)
E.25: Value Transfer Methods for Reimbursement	BlockBen will process the reimbursement to the retail holder using the same payment method originally used for the purchase of the CrowdX (CRDX) Utility Token, wherever possible. If the original payment method is not available or technically feasible, an alternative method may be used, subject to the agreement of the retail holder. In all cases: • Reimbursement will be made in fiat currency (EUR) or in equivalent value, depending on the original form of payment;

	• No fees or deductions will be applied by BlockBen for the reimbursement; • The full amount received will be refunded within 14 calendar days from the date the withdrawal request is received.
E.26: Right of Withdrawal	In accordance with Article 13 of Regulation (EU) 2023/1114 (MiCA), purchasers who qualify as retail holders are granted a 14-day right of withdrawal from the date of purchase of the CrowdX (CRDX) Utility Token. During this period, a retail holder may withdraw from the agreement without providing any reason. The withdrawal period begins on the date the purchase transaction is concluded. To exercise this right, the retail holder must notify BlockBen in a clear and unambiguous manner (via email to support@blockben.com) within the 14-day period. Upon receipt of a valid withdrawal request, BlockBen shall reimburse all payments received from the retail holder, including any applicable charges, without undue delay and no later than 14 calendar days from the date of notification. This right applies only to natural persons acting outside their trade, business, or profession. It does not apply to professional clients or institutional purchasers.
E.27: Transfer of Purchased Crypto-Assets	Upon successful completion of a purchase, CrowdX (CRDX) tokens will be credited to the purchaser's wallet within the BlockBen platform. Tokens are allocated in a permissioned environment, and access is restricted to wallets registered and verified under BlockBen's compliance framework. Token holders will be able to view and manage their CRDX tokens within the BlockBen Wallet interface. Transfers outside the platform (e.g., to third parties or exchanges) may be enabled at a later stage, in line with the project roadmap and regulatory considerations.
E.28: Transfer Time Schedule	Upon completion of a purchase, the CrowdX (CRDX) Utility Tokens are immediately credited and visible in the purchaser's BlockBen Wallet account. This ensures users have instant access to their tokens within the platform environment.
E.29: Purchaser's Technical Requirements	Purchasers of CrowdX (CRDX) tokens are not required to install or manage any third-party wallet software. The tokens are held and managed exclusively within the BlockBen Wallet, a proprietary, closed-system digital wallet integrated into the BlockBen platform. To access and hold CRDX tokens, purchasers must: • Create and verify a BlockBen user account, including completion of required KYC/AML checks; • Use a compatible web browser or mobile device with internet access to log in to their BlockBen Wallet; • Maintain secure login credentials (e.g., email, password, and any applicable two-factor authentication tools).
E.30: Crypto-asset service provider (CASP) name	N/A
E.31: CASP identifier	N/A
E.32: Placement form	NTAV
E.33: Trading Platforms name	N/A
E.34: Trading Platforms Market Identifier Code (MIC)	N/A
E.35: Trading Platforms Access	N/A
E.36: Involved costs	Users may be subject to exchange-defined trading or withdrawal fees, which are independent of BlockBen.
E.37: Offer Expenses	Legal and Regulatory Advisory: Approx. EUR 5,000 Covers MiCA compliance consultation, and preparation of licensing documents. Marketing and Promotion: Approx. EUR 7,000 Includes public communications, content creation, and promotional activities on the BlockBen platform.

	Platform Development: Approx. EUR 5,500
	For technical implementation and integration of CRDX tokens within the BlockBen Wallet interface.
	Operational and Administrative: Approx. EUR 7,500
	Supports internal operations, including customer support, administrative coordination, and KYC handling.
	Payment Processing and Transaction Fees: Approx. EUR 800
	Related to fiat and crypto payment handling during the offer phase.
E.38: Conflicts of Interest	As of the date of this whitepaper, no conflicts of interest have been identified between BlockBen SIA, its management, affiliated entities, or any other parties involved in the issuance and public offering of the CrowdX (CRDX) Utility Token.
	All decisions relating to the design, issuance, marketing, and management of the CRDX token have been made independently and in the best interest of future token holders. BlockBen maintains internal policies to identify and manage potential conflicts of interest in accordance with applicable regulatory requirements.
E.39: Applicable law	CrowdX (CRDX) Utility Token is governed by the laws of the Republic of Latvia, specifically in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA)
E.40: Competent court	Courts of Republic of Latvia

Part F - Information about the crypto-assets	
F.1: Crypto-Asset Type	Utility token
F.2: Crypto-Asset Functionality	The CrowdX (CRDX) Utility Token functions as a utility token within the CrowdedHero ecosystem, providing holders with a range of platform-specific rights and benefits. Its primary functionalities include:

For F.2, the bulleted list:

- Alternative Payment Method: CRDX tokens can be used in place of EUR to settle platform services and transaction fees, reinforcing their utility and offering potential discounts or promotions for active users.
- Registration Bonus Incentive: CrowdedHero buyers who have completed a purchase and are new to BlockBen are eligible to receive a bonus upon registering a BlockBen wallet, encouraging wallet adoption and further engagement.
- Exclusive Access: Token holders are granted early participation in new investment opportunities launched on the CrowdedHero platform.
- Priority Support: Holders benefit from priority customer service, ensuring timely assistance and an enhanced user experience.
- Additional Token-Holder Benefits: Once CRDX ownership is established, further purchases may qualify holders for additional platform-related benefits, fostering long-term engagement.

These functionalities are designed to encourage active participation, enhance user experience, and strengthen the overall value proposition of the CRDX token.

The token is non-transferable outside the ecosystem for general-purpose payments. It is not a financial instrument, security, or investment product, and does not confer ownership rights, profit-sharing, or governance powers. Its utility is strictly limited to the services and benefits offered within the BlockBen and CrowdedHero platforms, including:

Participation in platform-based product launches and special releases.

	Interaction within a closed, permissioned ecosystem, where the token serves solely as a utility instrument tied to specific products or services. CRDX does not grant ownership rights, profit-sharing, or governance power.
F.3: Planned Application of Functionalities	In the next development phases of the CrowdX project, the following functionalities are planned for the CRDX token: **Peer-to-Peer Token Transactions:** Enable the sale and purchase of CRDX tokens between users through the BlockBen Wallet platform. **Ecosystem Marketplace:** Implement a function within the CrowdedHero ecosystem to allow token holders to early access exclusive investment opportunities, platform-based product launches, and special services. **Token Redemption:** Support token redemption for platform benefits such as transaction fee discounts, priority support, and access to premium platform features.

A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article

F.4: Type of white paper	OTHR
F.5: The type of submission	NEW
F.6: Crypto-Asset Characteristics	Key characteristics include: • Token Type: Utility token (non-transferable during pre-sale phase) • Blockchain Infrastructure: Issued and held within a closed, permissioned blockchain managed by BlockBen • Token Supply: Maximum cap of 11,6 million tokens (with burning mechanisms applied post-sale) • Form: Digital token represented and managed within the BlockBen Wallet • Transferability: Non-transferable during pre-sale; transfer/sale functionality enabled in a later phase • No underlying asset or profit rights: CRDX does not represent ownership, entitlement to income, or voting rights
F.7: Commercial name or trading name	BlockBen SIA
F.8: Website of the issuer	www.blockben.com
F.9: Starting date of offer to the public or admission to trading	2026-01-10
F.10: Publication date	2026-01-08
F.11: Any other services provided by the issuer	N/A
F.12: Identifier of operator of the trading platform	N/A
F.13: Language or languages of the white paper	EN
F.14: Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	N/A
F.15: Functionally Fungible Group Digital Token Identifier, where available	N/A
F.16: Voluntary data flag	False
F.17: Personal data flag	False
F.18: LEI eligibility	True
F.19: Home Member State	Latvia
F.20: Host Member States	BlockBen SIA intends to offer the CrowdX (CRDX) Utility Token to clients in the following jurisdictions beyond its Home Member State (Latvia): European Union (EU) Member States: • Austria • Belgium • Bulgaria • Croatia • Cyprus

	• Czech Republic • Denmark • Estonia • Finland • France • Germany • Greece • Hungary • Ireland • Italy • Lithuania • Luxembourg • Malta • Netherlands • Poland • Portugal • Romania • Slovakia • Slovenia • Spain • Sweden European Economic Area (EEA) States: • Iceland • Norway • Liechtenstein

Part G - Information on the rights and obligations attached to the crypto- assets	
G.1: Purchaser Rights and Obligations	Rights of the Purchaser: • Right of Withdrawal: Retail purchasers have the right to withdraw from the purchase agreement within 14 calendar days of the purchase date, in accordance with Article 13 of Regulation (EU) 2023/1114. Upon valid withdrawal, the purchaser is entitled to a full refund without charges. • Access to Functionalities: Upon purchase, CRDX tokens are credited to the purchaser's BlockBen Wallet and provide immediate access to platform-exclusive product offerings and digital features. • Transparency and Information: Purchasers have the right to access this whitepaper and other relevant information related to the crypto-asset offering, including token utility, terms, risks, and ongoing updates. • Data Protection: Personal data of purchasers is handled in accordance with Regulation (EU) 2016/679 (GDPR), and purchasers have rights to access, correct, or request deletion of their personal data. Obligations of the Purchaser: • Wallet Access and Security: Purchasers must securely maintain access credentials to their BlockBen Wallet and are responsible for any unauthorized access due to negligence or credential sharing. • KYC/AML Compliance: Purchasers are required to complete identity verification (KYC) and comply with anti-money laundering (AML) requirements before completing the purchase. • Use Within Ecosystem: CRDX is intended solely for use within the BlockBen platform currently. Purchasers agree not to use the token for prohibited or unlawful purposes.
G.2: Exercise of Rights and obligations	Right of Withdrawal (Article 13 MiCA):

	• Purchasers who qualify as retail holders may withdraw from the purchase agreement within 14 calendar days from the date of purchase. • To exercise this right, the purchaser must submit a clear and written request to: Email: support@blockben.com • Subject line: "Withdrawal Request – CRDX Token Purchase" • Upon receiving a valid request, BlockBen will refund the full amount paid within 14 calendar days, using the same payment method, unless otherwise agreed. Right to Access Information: • The current whitepaper and any updates will be made available free of charge on the official website • Any material changes to token functionality, transferability, or regulatory status will be communicated via email and published on the platform. Right to Data Protection (GDPR): • Purchasers may exercise rights related to their personal data (access, correction, deletion) by submitting a request to: Email: dataprotection@blockben.com Right to Submit Complaints: • Users may file complaints related to token access, wallet functionality, or exercise of rights via: Email:support@blockben.com A response will be provided within 15 business days, in line with internal complaint handling procedures.

G.3: Conditions for modifications of rights and obligations	BlockBen SIA reserves the right to modify the rights and obligations associated with the CrowdX (CRDX) Utility Token under the following conditions:
	• Regulatory Changes: Adjustments may be made if required by updates to applicable legislation or supervisory guidance under Regulation (EU) 2023/1114 (MiCA), GDPR, or Latvian national law.
	• Platform or Token Functionality Updates: Changes related to token transferability, redemption methods, or platform usage terms may be introduced as part of product evolution or technical upgrades, provided such changes do not materially reduce the rights of existing purchasers.
	• Notification Requirement: Any material modification will be:
	    ○ Published on the BlockBen website
	    ○ Communicated directly to token holders via email or the BlockBen Wallet interface;
	    ○ Made available at least 14 calendar days in advance, unless urgent legal compliance requires shorter notice.
	• Right to Withdraw in Case of Adverse Changes: If a modification materially affects the rights of retail purchasers, they may exercise the right to withdraw from the purchase agreement, provided the withdrawal is submitted within 14 calendar days from the notification of the change.

G.4: Future Public Offers	BlockBen SIA may engage in future public offers of additional crypto-assets that serve distinct utility functions within the BlockBen ecosystem. These may include: • Expanded CrowdX token series to support new service lines or limited edition releases; • Platform-specific utility tokens related to other digital services or experiences, subject to separate whitepaper disclosures and compliance with Regulation (EU) 2023/1114;

G.5: Issuer Retained Crypto-Assets	N/A
	Should any tokens remain unallocated after the offering concludes, and are not designated for future functional use, they may be:
	• Burned using an irreversible smart contract mechanism; or
	• Permanently withdrawn from circulation, ensuring that they cannot re-enter the market.
G.6: Utility Token Classification	TRUE
G.7: Key Features of Goods/Services of Utility Tokens	The CrowdX (CRDX) Utility Token provides token holders with access to high-quality, platform-specific services that are strictly defined and measurable:
	Quality: All services accessible via CRDX-such as early participation in investment opportunities, priority customer support, and fee discounts-are standardized, reliably delivered, and regulated under the CrowdedHero and BlockBen platforms. The token ensures consistent user experience and dependable access to all designated platform functionalities.
	Quantity: The availability of services is proportional to the number of tokens held. For example, holding a minimum threshold of CRDX tokens may grant early access to certain investment rounds or enable a percentage-based reduction in platform fees. This creates a transparent and predictable correlation between token ownership and utility benefits.
	CRDX tokens are designed to be strictly non-fungible for general-purpose payments, and all goods and services are confined to the BlockBen and CrowdedHero ecosystem, ensuring both operational control and quality assurance.
	The number of services accessible per token may vary depending on the product series, availability, and platform engagement mechanics (e.g., limited series releases, loyalty programs).
G.8: Utility Tokens Redemption	Redemption Mechanics:
	Token holders access the CrowdX redemption interface via the BlockBen Wallet.
	CrowdX (CRDX) tokens can be redeemed exclusively within the BlockBen and CrowdedHero platforms for platform-specific benefits. Redemption allows token holders to settle transaction fees, early access exclusive investment opportunities, participate in special product launches, and receive priority customer support.
	Tokens cannot be redeemed for cash or transferred outside the ecosystem for general-purpose payments. This redemption model ensures that the utility of CRDX remains strictly tied to the services and benefits offered within the regulated platform environment, reinforcing both the token's functional value and compliance with MiCA regulations.
	Redemption is final and one-directional—redeemed tokens are considered spent and are not re-issuable or resalable.
G.9: Non-Trading request	TRUE
G.10: Crypto-Assets purchase or sale modalities	N/A
G.11: Crypto-Assets Transfer Restrictions	The CrowdX (CRDX) Utility Token is non-transferable during the pre-sale phase. Tokens are credited to purchasers' BlockBen Wallet accounts upon purchase but cannot be transferred, traded, or withdrawn during this period.
	Transferability will be enabled:
	• Only after the end of the public offer, and
	• Following the expiration of the 14-day withdrawal period, in accordance with MiCA Article 12.
	Once transfer functionality is activated:
	• Tokens may be transferred within the BlockBen ecosystem or to approved environments,

	• Transfers may be subject to KYC/AML controls and platform-specific compliance rules, • No external blockchain wallet support is available during the initial offering phase.
G.12: Supply Adjustment Protocol	TRUE
G.13: Supply Adjustment Mechanisms	The total supply of CrowdX (CRDX) Utility Tokens is capped at 11,600,000 tokens. No additional tokens will be minted beyond this maximum supply. However, supply reduction mechanisms may apply, including: • Token Burning: CRDX tokens used in product redemptions may be burned (permanently removed from circulation), depending on the structure of each promotional campaign. • Locked Reserves: A portion of the total supply may be time-locked or held in reserve for specific future use cases, which may limit circulating supply without changing the total cap. • No Minting Mechanism: The smart contract and issuance logic do not include functionality for future minting or supply expansion.
G.14: Token Value Protection Schemes	FALSE
G.15: Token Value Protection Schemes Description	N/A
G.16: Compensation Schemes	FALSE
G.17: Compensation Schemes Description	N/A
G.18: Applicable law	CrowdX (CRDX) Utility Token is governed by the laws of the Republic of Latvia, specifically in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA)
G.19: Competent court	Courts of Republic of Latvia

Part H - information on the underlying technology	
H.1: Distributed ledger technology	Natrix is a hybrid, consortium-style distributed ledger ("not open, not closed") specifically designed for regulated environments. It encrypts data on the blockchain but retains certain centralized controls (e.g., freezing of accounts) to meet supervisory requirements. Each financial institution deploys its own blockchain, ensuring data never leaves the institution; only zero-knowledge proofs (ZK proofs) may be shared with other institutions over the Natrix network or external blockchains.
H.2: Protocols and technical standards	Natrix uses a microservice architecture and the following main cryptographic standards: • Elliptic curves: BLS12-381 (for distributed key generation) and secp256k1 • Encryption & hashing: ECIES, AES, HMAC, SHA, bcrypt, scrypt • Consensus: proof of identity and zero knowledge proof based proofs • Programming: TypeScript-based SDK for smart-contract-like functionality • R&Đ: Under development to replace cryptographic primitives in our existing protocols with post quantum safe solutions using ML-KEM and ML-DSA
H.3: Technology Used	The Natrix platform is a hybrid, blockchain-based system designed specifically for the secure handling, storage, and transfer of digital assets (including crypto-assets) in regulated environments. Key aspects include: Client-Side Key Generation and Distributed Key Storage • User devices generate private keys that never leave the device; thus, transactions require explicit authorization from the user. • System (central) keys are cryptographically linked to user keys, allowing the service provider to freeze or suspend accounts if required by regulators (but not to conduct transactions unilaterally).

	• Shared key generation (e.g., BLS12-381–based NPVDKG-RS) enables M-of-N multi-signature schemes (e.g., multi-owner accounts).
	Data Storage and Encryption
	• Data on the blockchain is encrypted by default (e.g., via ECIES, AES, HMAC, SHA), preventing unauthorized access to stored information.
	• The platform manages cryptographic keys using a segmented approach (key fragments), reinforcing data security.
	• A World State Machine (WSM) cache holds the most recent data values, so users can access up-to-date information without traversing the entire blockchain.
	Smart-Contract-Like Features (Smart Contract Runtime)
	• Natrix provides a TypeScript-based execution environment that runs business logic via microservices.
	• Developers define custom "smart" functionality, which is stored on the blockchain and executed in a sandbox environment within the platform.
	• The platform's extended consensus algorithm validates each of these functionalities before they are committed.
	Secure, Reliable Transaction Handling
	• Transactions rely on a two-phase commit approach combined with an extended RAFT-style consensus, preventing data corruption and ensuring that asset transfers occur in a controlled, lawful way.
	• Each transaction carries a digital signature and zero-knowledge proof that are stored on-chain, making post-hoc tampering virtually impossible.
	Compliance with Regulatory and Audit Requirements
	• The platform supports dedicated Audit Ledgers or Authority Nodes, which allow auditors or regulators to verify data in encrypted form while confirming its authenticity.
	• Where regulations mandate suspension or restriction of accounts (e.g., a court order or supervisory request), the Natrix architecture allows for temporary or forever freezes without exposing private keys.
	By integrating these cryptographic and architectural features, Natrix provides robust security and flexibility for issuing, storing, and transferring crypto-assets, while supporting the central control functions and oversight requirements that regulated financial and payment environments demand.
H.4: Consensus Mechanism	The consensus mechanism is primarily based on proof of identity and zero-knowledge proofs (ZK proofs), ensuring that verified proof data is replicated across the ledger nodes. This configuration enables two-phase commit and anti-monopolize measures, preventing any single node from seizing control. Furthermore, distributed key generation and distributed signing establish a dependency between users and the system, ensuring that neither side can produce a valid message or transaction without the other's explicit involvement.
H.5: Incentive Mechanisms and Applicable Fees	There is no network fee, we have processing fee and transaction fee. The processing fee goes to a gold pool, which is an incentive pool for the Blockben ecosystem.
H.6: Use of Distributed Ledger Technology	TRUE
H.7: DLT Functionality Description	Natrix's DLT is structured into clusters, with each cluster serving as its own permissioned ledger within a larger network. Data is kept in an immutable blockchain layer and also stored in a World State Machine (WSM) cache for rapid reads. All data is encrypted by default, and only authorized parties hold the corresponding decryption keys. The platform uses microservices (Executors and Ledger nodes) for transaction processing and block creation.

	No direct data transfer occurs across clusters. Instead, zero-knowledge proofs are exchanged. Each cluster effectively represents a separate financial institution.
	Natrix lightpaper: https://data.natrix.io/docs/Natrix_Lightpaper.pdf
	https://github.com/natrixofficial/npvdkgrs/blob/master/math/NPVDKGRS.pdf
H.8: Audit	The cryptographic parts have been checked by external mathematicians, by the Cryptography Department of Eötvös Lóránd Tudományegyetem (Hungary).
H.9: Audit outcome	During the audit, the mathematicians found no errors, they found an acceleration potential in the algorithm, which means that the cost of distributed generation of the consensus and digital keys is about 20% lower.

Part I - Information on the risks	
I.1: Offer-Related Risks	1. Regulatory and Legal Risk
	• The legal and regulatory framework for crypto-assets is constantly evolving. Changes in EU or national legislation may affect the use, transferability, or regulatory treatment of CRDX tokens, as well as the operations of the BlockBen platform.
	• Certain jurisdictions may impose restrictions or prohibitions on accessing crypto-asset products.
	2. Market and Value Risk
	• The value of CRDX tokens is subject to fluctuations based on demand, platform activity, and broader market conditions.
	• There is no mechanism to guarantee or stabilize the token's value.
	3. Liquidity Risk
	• CRDX tokens are non-transferable during the pre-sale period. Even once transferability is enabled, secondary market liquidity may be limited, which could restrict the ability to sell or exchange tokens promptly.
	4. Technological and Cybersecurity Risk
	• Any vulnerabilities in the BlockBen Wallet, underlying blockchain infrastructure, or user access controls may lead to token loss, theft, or inaccessibility.
	• BlockBen implements robust security measures, but no system is immune to cyber threats.
	5. Operational Risk
	• Interruptions, technical failures, or maintenance downtime on the CrowdedHero or BlockBen platforms that may temporarily prevent the use or transfer of CRDX tokens.
	6. Platform Dependency Risk
	• CRDX tokens are functional exclusively within the BlockBen and CrowdedHero ecosystem. If one of the platform were to become unavailable, token utility could be affected.
	7. No Financial Return
	• CRDX tokens do not represent ownership, profit-sharing, or claims to financial returns. They are not intended as investment products.
	8. Crowdfunding Success Risk
	• The utility of CRDX is linked to the CrowdedHero ecosystem. If funded projects fail to reach their crowdfunding targets or underperform, the overall attractiveness and perceived value of the token could be negatively impacted.
	9. Right of Withdrawal Limitations
	• The right of withdrawal is available only to retail purchasers for a limited 14-day period after purchase, as

	per Article 12 of MiCA.
I.2: Issuer-Related Risks	1. Financial Situation Risk • BlockBen SIA is a newly incorporated entity in Latvia and does not yet have a full financial history. While supported by the broader BlockBen group, its financial performance is still in early stages. • Operational funding is primarily shareholder-driven, and the company may rely on future revenues or capital injections to sustain development and regulatory compliance. 2. Business Activity and Sector Risk • BlockBen operates in the highly dynamic and competitive digital asset and tokenization industry. • Regulatory scrutiny, market volatility, or a shift in consumer interest toward competing platforms or products could impact its business model. 3. Legal and Regulatory Risk • While BlockBen SIA is actively pursuing MiCA registration in Latvia, changes in legal interpretation or future regulatory developments could affect token offerings, wallet operations, or product availability. • Cross-border activities and planned passporting across the EU increase exposure to multi-jurisdictional compliance risk. 4. Internal Control and Governance Risk • As BlockBen SIA is under establishment, some key roles (e.g., AML Officer, Compliance Officer) are still being finalized or outsourced, which may pose temporary governance gaps. • The company is scaling its internal controls and audit functions, but any deficiencies could result in compliance delays or operational inefficiencies. 5. Dependency on Key Individuals • BlockBen relies on a small group of founding shareholders and management. The departure or unavailability of key individuals could impact the execution of its strategy or regulatory obligations. 6. Technological and Outsourcing Risk • Some IT and auditing functions are outsourced to third parties. While this allows for operational flexibility, it introduces third-party risk, including service continuity and data protection concerns.
I.3: Crypto-Assets-related Risks	1. Utility Risk • CRDX does not represent ownership, investment, or income-generating rights. • Its value is derived solely from its utility — i.e., access to CrowdedHero services and platform features. If demand for these services declines, token utility and perceived value may also decrease. 2. Market Value Volatility • Although CRDX is not intended for speculative purposes, once transferability and trading are enabled, its value may fluctuate based on user demand, market sentiment, or secondary market activity. 3. Transferability Limitations • CRDX is non-transferable during the pre-sale phase. Future transferability and listing are conditional on the completion of the offer phase and compliance measures. Unexpected delays could affect usability.

	4. Redemption Risk
	    • Token holders may face limitations in redeeming CRDX for projects due to limited stock, geographic restrictions, or platform availability.
	5. Platform Dependency
	    • The token can only be used within the BlockBen ecosystem. If the platform becomes unavailable or is suspended, token usability would be directly affected.
	6. Cyber and Fraud Risk
	    • While the token operates within a permissioned system, cyberattacks or unauthorized access to user wallets could result in the loss or misuse of tokens.
	7. Loss of Access
	    • Loss of credentials or failure to complete required identity verification may result in the permanent loss of access to tokens.
	8. Smart Contract Risk
	    • Although CRDX is not deployed on an open blockchain, any future changes involving smart contracts (e.g., enabling transferability or burning mechanisms) may introduce technical vulnerabilities.

I.4: Project Implementation-Related Risks	1. Development Delays
	    • Technical development of new services, token utilities, and user interface upgrades may take longer than expected, delaying access to certain functionalities or product drops.
	2. Supply Chain and Fulfillment Risk
	    • Delays or failures from technology partners, cloud service providers, or payment processors could affect token functionality or platform operations on CrowdedHero's side.
	3. Resource Allocation Constraints
	    • As BlockBen SIA is in the process of establishment, any shortfall in human or financial resources could affect execution timelines for the platform's product development and operational scaling.
	4. Scalability Challenges
	    • If user adoption exceeds current infrastructure capacity, there may be performance bottlenecks in redemption, wallet responsiveness, or support operations.
	5. Platform Integration Risk
	    • Token functionalities rely on seamless integration within the BlockBen Wallet ecosystem. Technical issues or lack of compatibility with planned updates could affect token usability.
	6. Compliance and Approval Delays
	    • MiCA registration, transferability features, or potential secondary market access depend on regulatory milestones. Delays in approvals or unexpected changes in compliance expectations could impact implementation timelines.
	7. Third-Party Dependency
	    • The project relies on external partners for legal services, and some IT operations. Performance, availability, or contractual issues with these vendors could introduce risk to deliverables.

I.5: Technology-Related Risks	1. Data & System Security Vulnerabilities: Loss of control over systems and personal/business data (e.g. Unauthorized access, No traceability or accountability, Inability to apply security updates or respond to incidents, Disruption of internal operations, Data loss or exposure) 2. GDPR & Data Subject Rights Gaps: Lack of legal basis,

	transparency, and user data handling policies
	3. Incident Management Deficiencies: No structured incident response or breach notification framework (e.g. Employees don't know who to alert or what to do when something suspicious happens; There's no defined incident severity classification, escalation path, or documentation template; The company cannot meet legal deadlines
	4. Backup & Recovery Gaps: No verifiable, system-independent backups
	5. Access Control & Credential Weaknesses: Weak password practices and lack of secure storage
	6. Deficient Role Separation and External Dependencies: Overreliance on external system administrators without proper redundancy or oversight
I.6: Mitigation measures	1. Data & System Security Vulnerabilities: Mitigation Strategies: • Implement a centralized Identity and Access Management (IAM) system with role-based permissions. • Deploy multi-factor authentication (MFA) and session logging for all critical systems. • Maintain audit trails and change logs to enable traceability (DORA Art. 9). • Enforce regular patch management and vulnerability scans. 2. GDPR & Data Subject Rights Gaps: Mitigation Strategies: • Conduct a GDPR gap assessment and implement a Record of Processing Activities (RoPA). • Create a public-facing privacy policy, with clear legal bases and purpose mapping. • Develop automated workflows for data subject requests (DSRs): access, rectification, erasure, etc. • Establish data retention and minimization policies for all personal data types. • Log all consents and user actions using cryptographic proof where possible (e.g., hash chains). 3. Incident Management Deficiencies: Mitigation Strategies: • Draft and approve a formal Incident Response Policy with defined roles and escalation matrix. • Set up an Incident Management Team (IMT) and assign a Security Officer. • Define incident severity levels and expected timelines (e.g., GDPR 72-hour rule). • Run simulation exercises and tabletop testing quarterly. 4. Backup & Recovery Gaps: Mitigation Strategies: • Use immutable, encrypted backups, stored outside primary infrastructure. • Automate daily incremental and weekly full backups. • Schedule quarterly disaster recovery tests and document restore times (RTO/RPO). • Assign accountability to a Business Continuity Lead (DORA Art. 11–12). 5. Access Control & Credential Weaknesses: Mitigation Strategies: • Implement a secure password vault (e.g., Bitwarden, HashiCorp Vault). • Enforce password rotation, complexity rules, and account lockout on failed attempts. • Enable role-based access controls (RBAC) tied to a centralized IAM system. • Review access rights quarterly and conduct privilege minimization reviews. • Educate staff with cybersecurity training on phishing and

	credential hygiene.
	6. Deficient Role Separation and External Dependencies: Mitigation Strategies:
	• Develop an internal IT competency framework and assign in-house technical leads.
	• Require multi-person access approvals (four-eyes principle) for system changes.
	• Define service level agreements (SLAs), audit rights, and breach obligations in all third-party contracts.
	• Build and cross-train a replacement plan for all external critical roles.
	Monitor critical third-party services under a Third-Party Risk Management Policy (DORA Art. 28–31).

Part J - Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts

General information

S.1: Name	BlockBen SIA
S.2: Relevant legal entity identifier	254900BBV7FA7LUG5913
S.3: Name of the crypto- asset	CrowdX (CRDX)
S.4: Consensus Mechanism	CrowdX (CRDX) is issued on the proprietary BlockBen (Natrix) blockchain, which operates using a hybrid, permissioned consensus model. The validation of transactions is carried out by authorized nodes under strict internal governance policies, ensuring integrity, speed, and compliance with regulatory requirements. Natrix is optimized for private ledger applications and is not reliant on mining or energy-intensive operations.
S.5: Incentive Mechanisms and Applicable Fees	Burning Mechanism: • 7,1% of the global revenue from sales of CrowdedHero used to buy back and burn the 2/3 of these CrowdX tokens. This reduces circulating supply and aims to increase token scarcity over time. Discount on transactional fees: • Temporary promotions or bonus programs may be introduced to reward early adopters or high-activity users within the ecosystem. Marketing and Catch-Up Bonuses: • Special marketing bonuses and catch-up commissions are allocated based on competitive tasks or when roles in the referral chain shift, ensuring continued motivation across participants
S.6: Beginning of the period to which the disclosure relates	2026-01-10
S.7: End of the period to which the disclosure relates	N/A

Mandatory key indicator on energy consumption

S.8: Energy consumption	62 kWh per year
S.9: Energy consumption sources and methodologies	The energy consumption and associated carbon emissions data presented herein are derived from the AWS Customer Carbon Footprint Tool, which calculates the environmental impact of AWS infrastructure services utilized by BlockBen SIA. This analysis specifically covers the period from January to August 2024, with figures proportionally annualized to reflect a full-year estimate. The AWS methodology considers actual service usage—in this case, Amazon EC2 instances only—and accounts for the regional carbon intensity of the hosting location (EU Central – Frankfurt). For the reporting period, AWS reported 0.004 tCO_2e emissions attributable to BlockBen's EC2 usage. To estimate total energy consumption (in line with MiCAR Section S.8), we applied AWS's regional carbon intensity factor for EMEA (~0.013 $kgCO_2e$/kWh). Based on this, the reported emissions correspond to an estimated annual electricity consumption of approximately 308 kWh.

	This consumption figure was allocated based on previous projects' token usage, as CRDX will be launched on 10.01.2026. *Note: The AWS Carbon Footprint Tool currently reflects zero values from September 2024 onwards, which is presumed to result from delayed data release or quarterly reporting practices. Therefore, this disclosure relies on the most recent 8-month data and applies proportional extrapolation to complete the annual estimate.*
Supplementary key indicators on energy and GHG emissions	
S.10: Renewable energy consumption	99%
S.11: Energy intensity	0.062 kWh/Transaction – Please note that this is an expected emission based on previous transaction data, as the CrowdX Token will be launched on 10.01.2026.
S.12: Scope 1 DLT GHG emissions – Controlled	0 tCO2e (no physical infra). No Scope 1 emissions are reported, as Blockben operates no on-premises infrastructure, vehicles or direct energy sources. All operations are cloud-based.
S.13: Scope 2 DLT GHG emissions – Purchased	0.004 tCO2e × 20% = ~0.0008 tCO2e
S.14: GHG intensity	0.0008 kgCO2e/Transaction - Please note that this is an expected emission based on previous transaction data, as the CrowdX Token will be launched on 10.01.2026.
Sources and methodologies	
S.15: Key energy sources and methodologies	The electricity used for token validation is sourced from Amazon Web Services (AWS) infrastructure located in the EU Central (Frankfurt) region. According to AWS sustainability disclosures, approximately 99% of the electricity used in the EMEA region is derived from renewable sources, primarily wind and solar energy. To calculate energy intensity in accordance with MiCAR requirements, token-level annual energy consumption was divided by the respective annual transaction volume. This yields a granular view of electricity usage per transaction, supporting the assessment of environmental impact on a per-asset basis.
S.16: Key GHG sources and methodologies	Greenhouse gas (GHG) emission figures are derived from the AWS Customer Carbon Footprint Tool, which reports Scope 2 emissions based on the energy consumption of AWS services used by BlockBen. Scope 1 emissions are recorded as 0 tCO$_2$e, as BlockBen does not operate any on-premises infrastructure or company-owned energy production. Scope 2 emissions are calculated by AWS using region-specific energy mix and intensity data and reported in metric tonnes of CO$_2$-equivalent (tCO$_2$e). AWS's methodology adheres to internationally recognized standards, including the Greenhouse Gas Protocol. While the reporting entity (BlockBen) does not hold ISO 14064 certification, all disclosed data are based on verified cloud provider metrics. For the purpose of token-level emissions disclosure: • Total Scope 2 emissions reported by AWS for the January–August 2024 period were 0.004 tCO$_2$e. • Emissions were proportionally allocated based on estimated transaction volume: ○ CrowdX (CRDX): 20% share = 0.0008 tCO$_2$e. To calculate GHG intensity (S.14), this token-specific emission value was divided by the number of annual transactions. For CrowdX, this results in an estimated 0.0008 kgCO$_2$e per transaction.