

# SatLayer MiCAR White Paper



IN ACCORDANCE WITH  
TITLE II OF REGULATION (EU) 2023/1114

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01. Date of Notification: 2025-08-10

## Regulatory Disclosures

### **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 person seeking admission to trading 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 and, to the best of the knowledge of the management body of SatLayer, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.

### **04. Statement in accordance with Article 6(5), points (a), (b), (c):**

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

### **05. Statement in accordance with Article 6(5), point (d):**

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) and (f):**

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

### 07. 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 (36) or any other offer document pursuant to Union or national law.

**08. Characteristics of the Crypto-Asset** \$SLAY is a utility token used within the SatLayer protocol to access restaking services and earn rewards. It does not confer ownership, profit rights, or legal claims against the issuer. Purchasers may use \$SLAY by interacting with the protocol through supported wallets. Rights and obligations may evolve over time due to protocol upgrades or governance decisions, with relevant updates communicated via official channels.

**09. Utility Token Summary** \$SLAY is a utility token that grants access to SatLayer's decentralized restaking services, allowing users to stake supported crypto-assets and participate in securing Bitcoin Validated Services (BVSs) in return for protocol rewards. The token may also be used in future governance or feature access within the protocol. Transferability of \$SLAY may be restricted in jurisdictions where the use of the SatLayer protocol is prohibited, including sanctioned countries and territories listed by the FATF, OFAC, EU, or UN.

**10. Key Information About the Admission to Trading** Admission to trading of \$SLAY is currently being explored. The issuer is in discussions with centralized trading platforms, including Kraken and Bitvavo, regarding a potential listing. As of the date of this whitepaper, no formal admission has taken place. If \$SLAY is admitted to trading on a MiCAR-regulated platform, relevant disclosures and regulatory notifications will be made in accordance with MiCAR requirements.



## A. Information about the Person Seeking Admission to Trading

**A.1 Name:** Mithril Global Ltd

**A.2 Legal Form:** 6EH6

**A.3 Registered address:** Intershore Chambers, 3rd Floor Geneva Place, Road Town, Tortola, VG1110, VG

**A.4 Head office:** N/A

**A.5 Registration Date:** 2025-08-04

**A.6 Legal entity identifier:** N/A

**A.7 Another identifier required pursuant to applicable national law:** 2160104

**A.8 Contact telephone number:** +19173288837

**A.9 E-mail address:** contact@satlayer.foundation

**A.10 Response Time (Days):** 003

**A.11 Parent Company:** Mithril Foundation

**A.12 Members of the Management body:**

Name	Business Function	Business Address
Guo Zhanzhi Clarence	Authorised person of the Corporate Director, CG (Cayman) Corporate Services	Intershore Chambers, 3rd Floor Geneva Place, Road Town, Tortola, VG1110 British Virgin Islands

**A.13 Business Activity:** Operator of a decentralized protocol enabling Bitcoin restaking to enhance security and utility of Bitcoin Validated Services (BVSs).

**A.14 Parent Company Business Activity:** Mithril Foundation is a non-profit entity supporting the SatLayer Protocol, including coordination of DAO governance, protocol development, and ecosystem funding.

**A.15 Newly Established:** false

**A.17 Financial condition since registration:**

Since its registration and incorporation on 16 October, 2024, Mithril Global Ltd has been diligently maintaining its financial statements.

Summary of financial Position

Below is a summary of the financial position of Mithril Global Ltd:  
2025 June Financial Statements:

- Total assets: USD 22,851,200
- Liabilities: USD 0
- Total liabilities and equity: USD 22,851,200

#### Financial Performance

The financial performance of \$SLAY reflects its early-stage focus on ecosystem development and infrastructure expansion, consistent with its mission to secure and advance Bitcoin Validated Services (“BVSs”) that are using the SatLayer Protocol.

Mithril Global Ltd (through an affiliate entity) has been financially stable since its incorporation, supported by a US\$8million Pre-Seed private fundraising round completed in August 2024. Since its incorporation, the company has expanded its operations, , and established itself as a key player in the crypto and blockchain industry. \_ Mithril Global Ltd is in the growth phase, focusing on establishing a market presence. Looking ahead, the company anticipates continued financial growth, driven by market uptrends, increased adoption of digital assets, and expanding business activities.

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

**B.1 Issuer Information:** false, the offeror and entity are the same, so this section is not applicable

**B.2 Name:** N/A

**B.3 Legal Form:** N/A

**B.4 Registered address:** N/A

**B.5 Head office:** N/A

**B.6 Registration Date:** N/A

**B.7 Legal entity identifier:** N/A

**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:** N/A

**B.11 Business Activity:** N/A

**B.12 Parent Company Business Activity:** N/A

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

**C.1 Name:** N/A, This section is not applicable, as neither the operator of a trading platform nor any other person, apart from the issuer, has drawn up or contributed to the preparation of the crypto-asset white paper.

**C.2 Legal Form:** N/A

**C.3 Registered address:** N/A

**C.4 Head office:** N/A

**C.5 Registration Date:** N/A

**C.6 Legal entity identifier of the operator of the trading platform:** N/A

**C.7 Another identifier required pursuant to applicable national law:** N/A

**C.8 Parent Company:** N/A

**C.9 Reason for Crypto-Asset White Paper Preparation:** N/A

**C.10 Members of the Management body:** N/A

**C.11 Operator Business Activity:** N/A

**C.12 Parent Company Business Activity:** N/A

**C.13 Other persons drawing up the crypto- asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114:** N/A

**C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114:** N/A

## D. Information about the Crypto-Asset Project

**D.1 Crypto-asset project name:** SatLayer

**D.2 Crypto-assets name:** Satlayer

**D.3 Abbreviation:** \$SLAY

**D.4 Crypto-asset project description:** SatLayer is the economic layer for Bitcoin, making the best asset now fully programmable. SatLayer transforms Bitcoin into the standard/reserve asset for the new financial system, by plugging Bitcoin into the key components/rails that crypto has been building, including AI, stablecoins, RWA, and DeFi. As the leading Bitcoin restaking protocol, SatLayer redefines what's possible with fully programmable slashing by boosting Bitcoin's liquidity efficiency and focuses on delivering real yield, developing BVSs (Bitcoin Validated Services) with leading, revenue-generating protocols, around massive use cases with clear demand.

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

Name	Business Function	Business Address
Guo Zhanzhi Clarence	Authorised person of the Corporate Director, CG (Cayman) Corporate Services	Intershore Chambers, 3rd Floor Geneva Place, Road Town, Tortola, VG1110 British Virgin Islands

**D.6 Utility Token Classification:** true

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

SatLayer is developing a decentralized restaking protocol that allows \$BTC holders to secure Bitcoin Validated Services (BVSs) and earn rewards. Key features include:

- Bitcoin restaking infrastructure
- Support for Liquid Staked Tokens (LSTs)
- Security marketplace for BVSs
- Treasury-based incentive mechanisms

These services aim to extend Bitcoin's utility and enhance crypto-economic security across ecosystems.

**D.8 Plans for the token:** \$SLAY is an utility token within the SatLayer Protocol designed to enhance the security, utility, and governance of Bitcoin-based services through innovative restaking mechanisms and token economics. Moving forward, the issuer plans to maintain and expand the token's utility within the SatLayer Protocol. Current and future developments may include enhanced use cases in areas such as governance voting and restaking rewards

**D.9 Resource Allocation:** SatLayer (through an affiliate entity) has secured \$8 million in pre-seed funding to support protocol development, security audits, ecosystem incentives, and team expansion. The project is led by a multidisciplinary team comprising blockchain engineers, product managers, and advisors.

**D.10 Planned Use of Collected Funds or Crypto-Assets:** Funds raised in previous institutional fundraising rounds will be used for the development of the SatLayer Protocol.

## E. Information about the Admission to Trading

**E.1 Public Offering or Admission to trading:** ATTR

**E.2 Reasons for Public Offer or Admission to trading:**

The admission of \$SLAY to trading is intended to:

- (a) ensure compliant access to the European market under MiCA regulations;
- (b) enhance liquidity, transparency, and market efficiency while enabling broader adoption and usability of the token within the Satlayer protocol;
- (c) facilitate public distribution and price discovery through listing and
- (d) create a free-float for governance and network security.

**E.3 Fundraising Target:** N/A

**E.4 Minimum Subscription Goals:** N/A

**E.5 Maximum Subscription Goal:** N/A

**E.6 Oversubscription Acceptance:** N/A

**E.7 Oversubscription Allocation:** N/A

**E.8 Issue Price:** N/A

**E.9 Official currency or any other crypto- assets determining the issue price:** N/A

**E.10 Subscription fee:** N/A

**E.11 Offer Price Determination Method:** N/A

**E.12 Total Number of Offered/Traded Crypto- Assets:** 1

**E.13 Targeted Holders:** ALL

**E.14 Holder restrictions:** \$SLAY is not unavailable to residents of Cuba, Iran, North Korea, Syria, the Crimea, Donetsk People's Republic and Luhansk People's Republic regions of Ukraine, or any other country to which the United States embargoes goods or imposes similar sanctions, or any countries listed on OFAC the Office of Foreign Assets Control (OFAC) Sanctions list.

**E.16 Refund Mechanism:** N/A

**E.17 Refund Timeline:** N/A

**E.18 Offer Phases:** N/A

**E.19 Early Purchase Discount:** N/A

**E.20 Time-limited offer:** N/A

**E.21 Subscription period beginning:** N/A

**E.22 Subscription period end:** N/A

**E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets:** N/A

**E.24 Payment Methods for Crypto-Asset Purchase:** \$SLAY may be purchased using Stablecoins (eg. USDC/USDT)

**E.25 Value Transfer Methods for Reimbursement:** N/A

**E.26 Right of Withdrawal:** N/A

**E.27 Transfer of Purchased Crypto-Assets:** \$SLAY tokens will be transferred to the purchaser's designated wallet upon receipt of payment in stablecoins (e.g., USDC or USDT). Transfers occur on supported blockchain networks and are subject to verification and compliance checks.

**E.28 Transfer Time Schedule:** 2025-08-06

**E.29 Purchaser's Technical Requirements:** Purchasers must have a compatible, non-custodial crypto wallet (e.g., MetaMask) that supports the \$SLAY token and the relevant blockchain network. Internet access and basic blockchain literacy are also required to complete the transaction and manage the tokens.

**E.30 Crypto-asset service provider (CASP) name:** N/A

**E.31 CASP identifier:** N/A

**E.32 Placement form:** N/A

**E.33 Trading Platforms name:** Kraken, Bitvavo

**E.34 Trading Platforms Market Identifier Code (MIC):** PSGL, VAVO

**E.35 Trading Platforms Access:** Centralized and decentralized exchanges

**E.36 Involved costs:** Standard maker taker fees from CEXs and DEX gas + LP fee

**E.37 Offer Expenses:** N/A

**E.38 Conflicts of Interest:** N/A

**E.39 Applicable law:** N/A

**E.40 Competent court:** Any dispute with \$SLAY shall be brought in the courts of the British Virgin Islands except where prohibited by Applicable Laws.



## F. Information about the Crypto-Assets

**F.1 Crypto-Asset Type:** Utility token

**F.2 Crypto-Asset Functionality:** \$SLAY is the utility and governance token for the SatLayer ecosystem and may be used in the following manner:

- Governance Participation : \$SLAY holders can vote on governance decisions, including protocol upgrades, parameter changes, and fund allocations from the Foundation treasury.
- Value Accrual : Protocol fees generated by BVSs using SatLayer are partially funneled to the SatLayer Foundation treasury , denominated in \$SLAY and used for grants.
- Staking Utility : \$SLAY is stakeable alongside BTC (or BTC LSTs) to secure Bitcoin Validated Services (BVSs) via SatLayer. It helps amplify yield and security.
- Slashing Penalty Reserve : In cases of validator misbehavior, restaked \$SLAY (and BTC) can be slashed , serving as a penalty and security layer for services relying on SatLayer.

**F.3 Planned Application of Functionalities:** At the time of this publication, the \$SLAY token is functional for ecosystem incentives and participation in early restaking activities within the SatLayer protocol. Governance functionality and treasury-based funding mechanisms are in development and expected to launch in future iterations. Some functionalities, such as slashing and fee routing to the SatLayer Foundation, are dependent on individual Bitcoin Validated Services (BVSs) and will be progressively adopted across the ecosystem.

**F.4 Type of white paper:** OTHR

**F.5 The type of submission:** NEWT

**F.6 Crypto-Asset Characteristics:** Ticker: \$SLAY Type: ERC-20 Maximum supply: 2,100,000,000

**F.7 Commercial name or trading name:** SatLayer \$SLAY

**F.8 Website of the issuer:** <https://satlayer.foundation/>

**F.9 Starting date of offer to the public or admission to trading:** 2025-08-11

**F.10 Publication date:** 2025-08-10

**F.11 Any other services provided by the issuer:**

- Restaking Collateral : Acts as a restaking asset—in addition to BTC—that can be slashed for node misbehavior under BVS-defined conditions.
- Ecosystem Incentives : \$SLAY is used to incentivize adoption—distributed to restakers, developers, and BVS operators as rewards, liquidity incentives, and grants.

**F.12 Language or languages of the white paper:** 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: N/A

**F.14 Functionally Fungible Group Digital Token Identifier**, where available: N/A

**F.15 Voluntary data flag:** true

**F.16 Personal data flag:** false

**F.17 LEI eligibility:** true

**F.18 Home Member State:** IE

**F.19 Host Member States:** AT, BE, BG, HR, CY, CZ, DK, EE, FI, FR, DE, EL, HU, IS, IT, LI, LV, LT, LU, MT, NL, NO, PL, PT, RO, SK, SI, ES, SE

## G. Information on the rights and obligations attached to the crypto-assets

### G.1 Purchaser Rights and Obligations:

#### Rights

- **Utility Access:** Purchasers of \$SLAY tokens gain access to the SatLayer protocol's goods and services, including staking, governance participation, and incentive programs.
- **Governance Participation:** Token holders have the right to vote on proposals affecting protocol parameters, treasury management, and ecosystem development.
- **Economic Incentives:** Holders may receive rewards such as staking yields, liquidity mining incentives, and grants as defined by the protocol and governance.
- **Transferability:** \$SLAY tokens are transferable and can be traded on supported decentralized exchanges, subject to applicable legal restrictions.

#### Obligations

- **Compliance:** Purchasers must comply with applicable laws and regulations, including any jurisdictional restrictions or sanctions (e.g., not transferring tokens to prohibited persons or jurisdictions).
- **Wallet Responsibility:** Purchasers are responsible for maintaining the security of their wallets and private keys. Loss of access or control over wallet credentials may result in permanent loss of tokens.
- **Protocol Risks:** Purchasers acknowledge the risks inherent in using decentralized protocols, including smart contract vulnerabilities, market volatility, and potential loss of value.

**G.2 Exercise of Rights and obligations:** \$SLAY Holders can exercise their rights via onchain transactions in a permissionless manner. The use of \$SLY is subject to the terms and conditions of the SatLayer platform. Users must comply with KYC/AML requirements where applicable.

#### Conditions:

- Exercising rights requires interaction with the appropriate protocol smart contracts or governance interfaces.
- Holders must maintain control of their private keys and compatible wallets to participate effectively.
- Some governance actions may require minimum token holdings or quorum thresholds to be valid

**G.3 Conditions for modifications of rights and obligations:** Rights and obligations may be modified through governance or internal protocol processes, with appropriate public disclosure.

**G.4 Future Public Offers:** None

**G.5 Issuer Retained Crypto-Assets:** 1,365,000,000

**G.6 Utility Token Classification:** true

**G.7 Key Features of Goods/Services of Utility Tokens:**

- Governance Participation: \$SLAY holders can vote on governance decisions, including protocol upgrades, parameter changes, and fund allocations from the Foundation treasury.
- Value Accrual: Protocol fees generated by BVSs using SatLayer are partially funneled to the SatLayer Foundation treasury, denominated in \$SLAY and used for grants.
- Staking Utility: \$SLAY is stakeable alongside BTC (or BTC LSTs) to secure Bitcoin Validated Services (BVSs) via SatLayer. It helps amplify yield and security.
- Slashing Penalty Reserve: In cases of validator misbehavior, restaked \$SLAY (and BTC) can be slashed, serving as a penalty and security layer for services relying on SatLayer.

**G.8 Utility Tokens Redemption:** \$SLAY is not redeemable for physical goods or traditional services but instead provide access to digital protocol functionalities and economic incentives within the SatLayer Protocol.

**G.9 Non-Trading request:** true

**G.10 Crypto-Assets purchase or sale modalities:** N/A

**G.11 Crypto-Assets Transfer Restrictions:** No restrictions

**G.12 Supply Adjustment Protocols:** false

**G.13 Supply Adjustment Mechanisms:** N/A

**G.14 Token Value Protection Schemes:** false

**G.15 Token Value Protection Schemes Description:** N/A

**G.16 Compensation Schemes:** false

**G.17 Compensation Schemes Description:** N/A

**G.18 Applicable law:** The laws of the British Virgin Islands (“ Applicable Law ”)]

**G.19 Competent court:** Any dispute with \$SLAY shall be brought in the courts of the British Virgin Islands except where prohibited by Applicable Laws.

## H. Information on the Underlying Technology

**H.1 Distributed ledger technology:** \$SLAY uses Ethereum blockchain

**H.2 Protocols and technical standards:** \$SLAY is an ERC-20 token.

**H.3 Technology Used:** \$SLAY tokens are held and managed using compatible crypto wallets (e.g., MetaMask, hardware wallets) and transferred via Ethereum smart contracts. Trading occurs on decentralized exchanges.

**H.4 Consensus Mechanism:**

The \$SLAY is deployed as an ERC-20 on Ethereum Mainnet. For the operations of the \$SLAY token—such as issuance, transfers, and smart contract interactions—the protocol utilizes the Ethereum blockchain, which operates on a Proof of Stake (PoS) consensus mechanism following the Ethereum 2.0 upgrade.

PoS enables validators to confirm transactions and secure the network based on the amount of cryptocurrency they hold and are willing to "stake" as collateral. This mechanism is significantly more energy-efficient than Proof of Work (PoW), as it does not rely on high-power computational mining. The use of Ethereum's PoS consensus ensures that \$SLAY token operations are decentralized, secure, and scalable, while also contributing to a reduced environmental footprint.

By building on Ethereum, SatLayer benefits from the established validator infrastructure, high network uptime, and active developer ecosystem. Meanwhile, integration with Bitcoin through Babylon's restaking model provides enhanced cryptoeconomic security for cross-chain assets and staking layers. This dual-chain approach reflects SatLayer's commitment to combining security, interoperability, and efficiency in its consensus design.

**H.5 Incentive Mechanisms and Applicable Fees:**

SatLayer's economic model is designed to align the interests of various stakeholders through a structured incentive mechanism. Participants engaging with the protocol—such as staking, transferring \$SLAY tokens, or participating in governance—are subject to standard transaction fees (commonly referred to as gas fees), which are native to the Ethereum blockchain. These fees vary depending on network congestion and the complexity of the transaction but are essential for securing and processing operations on-chain.

Beyond Ethereum-level gas fees, SatLayer imposes protocol-level fees primarily on Babylon Validated Services (BVS) operators, who utilize SatLayer for cryptoeconomic security. These BVS operators pay fees in exchange for security guarantees provided by \$SLAY stakers and restakers. A portion of these protocol fees is programmatically redistributed as staking rewards to \$SLAY holders who participate in securing the network, thereby incentivizing active and honest participation.

Notably, the issuer does not impose direct purchase fees on the acquisition of \$SLAY tokens. However, users acquiring \$SLAY through centralized or decentralized exchanges may be subject to third-party trading or platform fees, which are determined by those venues and outside the control of the issuer.

The incentive system is structured to foster long-term engagement, sustainability, and decentralization, ensuring that rewards are aligned with value-added activities while avoiding excessive friction for users entering the ecosystem.

**H.6 Use of Distributed Ledger Technology:** false

**H.7 DLT Functionality Description:** N/A

**H.8 Audit:** true

**H.9 Audit outcome:** No major security vulnerabilities have been identified regarding the implementation of the SatLayer Protocol's smart contracts, with any minor security concerns already being rectified. More information found below.

<https://docs.satlayer.xyz/security/audits>

## I. Information on Risks

**I.1 Offer-Related Risks:** The admission to trading of \$SLAY involves risks related to market volatility, liquidity, regulatory uncertainties, and trading conditions. The crypto-asset market is highly dynamic, and the price of \$SLAY may experience significant fluctuations due to market sentiment, macroeconomic trends, and speculative activity. There is no guarantee of sustained liquidity or that an active secondary market for \$SLAY will develop or remain stable over time. Regulatory changes may impact trading conditions, exchange availability, or compliance requirements, potentially restricting access to \$SLAY in certain jurisdictions or imposing additional obligations on holders.

**I.2 Issuer-Related Risks:** N/A

**I.3 Crypto-Assets-related Risks:** The price of \$SLAY is subject to market fluctuations, speculative activity, and macroeconomic factors. There is no guarantee of sustained liquidity or that an active secondary market will remain stable. As an on-chain asset, SatLayer relies on smart contract functionality, which may be exposed to vulnerabilities, exploits, or unforeseen technical failures. Changes in crypto regulations, taxation, or trading laws could impact the availability, usability, or trading conditions of \$SLAY in different jurisdictions. The utility of \$SLAY depends on user adoption and platform growth. If demand for SatLayer's services does not scale as expected, the token's use case may be lower than anticipated.

**I.4 Project Implementation-Related Risks:** The utility of \$SLAY relies on widespread adoption within the SatLayer platform. If user engagement or demand for SatLayer services grows slower than anticipated, the token's functional value may be reduced. SatLayer collaborates with exchanges, custodians, and blockchain infrastructure providers. Any delays, technical failures, or security breaches in these third-party services could affect the availability or functionality of \$SLAY. The expansion of SatLayer's services, DeFi integrations, and financial products may face delays due to unforeseen technical challenges, regulatory changes, or resource constraints. Future changes in MiCA regulations, other applicable laws, or financial service requirements may impose additional obligations on the Issuer, potentially impacting the timeline or scope of planned developments.

**I.5 Technology-Related Risks:** \$SLAY relies on smart contracts for transactions. Any bugs, exploits, or coding errors could lead to security breaches, unintended loss of tokens, or unauthorized access. The Ethereum network is vulnerable to attacks, such as 51% attacks, Sybil attacks, or denial-of-service (DDoS) attacks, which could disrupt operations or compromise the integrity of \$SLAY transactions. Users must secure their private keys to access and transfer \$SLAY. Loss of a private key is irreversible, resulting in permanent loss of tokens. \$SLAY transactions depend on wallets, exchanges, and blockchain nodes. Any security breaches, operational failures, or regulatory issues affecting these third parties could impact \$SLAY availability. Further technical migration risks, interoperability issues, or unforeseen complications may arise in the future.

**I.6 Mitigation measures:** \$SLAY's smart contracts undergo rigorous security dual independent audits to detect and mitigate potential vulnerabilities and exploits before deployment. \$SLAY continuously strengthens its security infrastructure, including multi-signature authentication, encrypted key storage, and real-time threat monitoring to protect assets and transactions. The SatLayer team engages proactively with regulators to ensure compliance with MiCA and other applicable financial regulations. The SatLayer team carefully selects trusted blockchain infrastructure providers, custodians, and trading partners to reduce operational risks and enhance reliability. From time to time, the SatLayer team also offers bug bounties to persons who identify an error or vulnerability in the SatLayer protocol.



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

**S.1 Name:** Mithril Global Ltd

**S.2 Relevant legal entity identifier:** N/A

**S.3 Name of the crypto-asset:** N/A

**S.4 Consensus Mechanism:**

The \$SLAY is deployed as an ERC-20 on Ethereum Mainnet. For the operations of the \$SLAY token—such as issuance, transfers, and smart contract interactions—the protocol utilizes the Ethereum blockchain, which operates on a Proof of Stake (PoS) consensus mechanism following the Ethereum 2.0 upgrade.

PoS enables validators to confirm transactions and secure the network based on the amount of cryptocurrency they hold and are willing to "stake" as collateral. This mechanism is significantly more energy-efficient than Proof of Work (PoW), as it does not rely on high-power computational mining. The use of Ethereum's PoS consensus ensures that \$SLAY token operations are decentralized, secure, and scalable, while also contributing to a reduced environmental footprint.

By building on Ethereum, SatLayer benefits from the established validator infrastructure, high network uptime, and active developer ecosystem. Meanwhile, integration with Bitcoin through Babylon's restaking model provides enhanced cryptoeconomic security for cross-chain assets and staking layers. This dual-chain approach reflects SatLayer's commitment to combining security, interoperability, and efficiency in its consensus design.

**S.5 Incentive Mechanisms and Applicable Fees:**

SatLayer's economic model is designed to align the interests of various stakeholders through a structured incentive mechanism. Participants engaging with the protocol—such as staking, transferring \$SLAY tokens, or participating in governance—are subject to standard transaction fees (commonly referred to as gas fees), which are native to the Ethereum blockchain. These fees vary depending on network congestion and the complexity of the transaction but are essential for securing and processing operations on-chain.

Beyond Ethereum-level gas fees, SatLayer imposes protocol-level fees primarily on Babylon Validated Services (BVS) operators, who utilize SatLayer for cryptoeconomic security. These BVS operators pay fees in exchange for security guarantees provided by \$SLAY stakers and restakers. A portion of these protocol fees is programmatically redistributed as staking rewards to \$SLAY holders who participate in securing the network, thereby incentivizing active and honest participation.

Notably, the issuer does not impose direct purchase fees on the acquisition of \$SLAY tokens. However, users acquiring \$SLAY through centralized or decentralized exchanges may be subject to third-party trading or platform fees, which are determined by those venues and outside the control of the issuer.

The incentive system is structured to foster long-term engagement, sustainability, and decentralization, ensuring that rewards are aligned with value-added activities while avoiding excessive friction for users entering the ecosystem.

**S.6 Beginning of the period to which the disclosure relates:** 2025-08-11

**S.7 End of the period to which the disclosure relates:** 2025-08-18

**S.8 Energy consumption:** 2600 kWh

**S.9 Energy consumption sources and methodologies:**

The energy consumption estimate is based on publicly available data from independent research institutions, academic publications, and official reports issued by the foundations of supported blockchains (e.g., Ethereum Foundation). The methodology involves assessing the consensus mechanism used—such as Proof-of-Stake (PoS) or other energy-efficient alternatives—and calculating the average energy consumed per transaction or per validator across the relevant blockchain networks.

For SatLayer, which integrates with multiple Layer 1 networks through its restaking infrastructure, energy consumption primarily stems from validating transactions and maintaining the integrity of the distributed ledger through validator nodes. The protocol itself does not introduce significant additional energy consumption beyond what is required by the underlying blockchain networks.

Based on aggregated metrics, it is estimated that the SatLayer validator set consumes approximately 2,600 kWh of energy in total, annually. This figure represents the cumulative consumption of all active validator nodes supporting the protocol. The methodology for this calculation takes into account average node uptime, hardware specifications, regional electricity usage patterns, and blockchain-specific validator energy profiles. This estimate will be reviewed periodically to ensure alignment with protocol updates, validator participation levels, and broader environmental reporting standards.