Benqi (QI)
White paper

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

N	Field	Content
0	Table of content	

01	Date of notification	2025-07-14
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The operator of the trading platform of the crypto-asset is solely responsible for the content of this crypto-asset white paper.
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.
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.
05	Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	false
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.

<table>
<tr><td colspan="3">Summary</td></tr>
<tr><td>07</td><td>Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114</td><td>Warning
This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The admission to trading of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to Union or national law.</td></tr>
<tr><td>08</td><td>Characteristics of the crypto-asset</td><td>QI is the native utility and governance token of the BENQI decentralized finance (DeFi) platform built on Avalanche. It enables users to participate in validator delegation governance and access infrastructure such as validator staking via Ignite. QI can be staked to receive “BENQI Miles” (veQI), which grant holders influence over validator delegation through Node Voting. While full on-chain protocol governance (e.g., submitting and voting on parameter changes or proposals) is planned, it is not yet live.

The token has a fixed maximum supply of 7,200,000,000 units.

<table>
<tr><th>Category</th><th>Allocation</th></tr>
<tr><td>Community Incentives</td><td>45%</td></tr>
<tr><td>BENQI Foundation</td><td>15%</td></tr>
<tr><td>Core Contributors</td><td>10%</td></tr>
<tr><td>Seed / Private Investors</td><td>18%</td></tr>
<tr><td>Public Sale</td><td>7%</td></tr>
<tr><td>Exchange Liquidity</td><td>5%</td></tr>
</table>
</td></tr>
</table>

09	Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability	N/A
10	Key information about the offer to the public or admission to trading	Kraken seeks admission to trading of the QI token so as to be compliant with MiCA and in keeping with its mission to make available for trading to its clients a wide range of assets.
Part I – Information on risks		
I.1	Offer-Related Risks	**General Risk Factors Associated with Crypto-Asset Offerings** The admission to trading of crypto-assets, including QI, is subject to general risks inherent to the broader cryptocurrency market. **Market Volatility** The value of QI may experience substantial fluctuations driven by investor sentiment, macroeconomic developments, and market conditions. **Regulatory Risks** Changes in legislation, applicable laws, compliance requirements or the implementation of new regulatory frameworks could affect the availability, trading, or use of such assets. **Security Risks** The risk of exploitation, hacking or security vulnerabilities of the underlying protocol and/or contracts of the token leading to a loss. **Reputational Risks** The potential for damage to an organization's credibility or public trust, which can negatively impact stakeholder confidence and overall business viability**.**
I.2	Issuer-Related Risks	**Operational Risk** The issuer, Rome Blockchain Labs Inc., is a relatively small, privately held development company. Its operations depend on the continued engagement of key personnel, including its founding team. The departure of any of these individuals may delay development or impact the quality of the protocol.

		Governance Transition Risk Partial governance is currently live (Node Voting via veQI); however, full protocol-level governance (e.g., proposal execution, treasury control) remains under the issuer's multisig. During this transition, centralization risk persists. Disputes or delays in handing off control could create uncertainty or weaken accountability.
I.3	Crypto-Assets-related Risks	**Market Volatility** The crypto-asset market is subject to significant price volatility, which may affect the value of QI. Prices can fluctuate rapidly and unpredictably due to various factors, including market sentiment, economic indicators, technological developments, regulatory news, and macroeconomic trends. This high level of volatility may lead to sudden gains or losses and can impact the liquidity and tradability of the crypto-asset. **Liquidity** Liquidity refers to the ability to buy or sell a crypto-asset without causing significant price impact. QI may experience periods of low liquidity, meaning that it could be difficult to enter or exit positions at desired prices or volumes. Reduced liquidity may result from limited market participation, exchange restrictions, or broader market conditions. This can lead to increased price volatility, slippage, and difficulty in executing transactions. **Cybersecurity & Technology Risks** Risks arising from vulnerabilities in the blockchain technology used by the project or platforms. Example risks include smart contract exploits, compromise of platforms, forking scenarios, compromise of cryptographic algorithms. **Adoption Risks** If the project fails to achieve its goals, adoption and usage may be lower than expected. This could reduce the token's utility and overall value proposition. **Custody & Ownership Risk** The risk related to the inadequate safekeeping and control of crypto-assets e.g. loss of private keys, custodian insolvency leading to a loss.
I.4	Project Implementation-Related Risks	**Development Delays** BENQI's roadmap includes enhancements such as expanded governance and validator infrastructure. Delays in feature deployment (e.g., full on-chain governance or veQI enhancements) could affect user trust and token utility. **Adoption Risk** The platform's success depends on attracting sufficient user activity in lending, staking, and governance features. Low adoption could reduce demand for QI

		and negatively impact its perceived utility.sociated with project implementation
I.5	Technology-Related Risks	**Smart contract risks** QI uses smart contracts to facilitate automated transactions and processes. While these contracts enhance efficiency and decentralization, they also introduce specific technical risks. Vulnerabilities such as coding errors, design flaws, or security loopholes within the smart contract code may be exploited by malicious actors. Such exploits could result in the loss of assets, unauthorized access to sensitive information, or unintended and irreversible execution of transactions. **Blockchain Network Risks** QI operates on a public blockchain infrastructure, which is maintained by a decentralized network of participants. The functionality and reliability of the crypto-asset are dependent on the performance and security of the underlying blockchain. Risks may include network congestion, high transaction fees, delayed processing times, or, in extreme cases, outages and disruptions. Additionally, vulnerabilities or failures in the consensus mechanism, attacks on the network (e.g., 51% attacks), or protocol-level bugs could impact the operation and availability of QI. **Risk of Cryptographic Vulnerabilities** Technological advancements, such as quantum computing, could pose potential risks to cryptocurrencies. **Privacy** Transactions involving QI are recorded on a public blockchain, where transaction data is transparent and permanently accessible. While public addresses do not directly reveal personal identities, transaction histories can be analyzed and, in some cases, linked to individuals through data aggregation or external information sources. This transparency may pose privacy concerns for users seeking confidentiality in their financial activity. Transaction data on public blockchains is not inherently private and could be subject to scrutiny by third parties, including regulators, analytics firms, or malicious actors.
I.6	Mitigation measures	**Security Audits** BENQI smart contracts have undergone multiple audits by Halborn, Certora (formal verification), and Dedaub. Identified issues were remediated prior to deployment. No critical vulnerabilities remain open. **Multisig Safeguards** Treasury and upgrade permissions are currently protected by multi-signature wallets held by trusted parties. While this introduces centralization, it mitigates single-point-of-failure risks until full governance is launched.

		Partial Governance via veQI While BENQI protocol governance is not yet fully decentralized, partial governance exists through BENQI Miles (veQI). QI holders can influence validator delegation via Node Voting, offering a limited but live form of user-directed control.
Part A - Information about the offeror or the person seeking admission to trading		
A.1	Name	N/A
A.2	Legal form	N/A
A.3	Registered address	N/A
A.4	Head office	N/A
A.5	Registration Date	N/A
A.6	Legal entity identifier	N/A
A.7	Another identifier required pursuant to applicable national law	N/A
A.8	Contact telephone number	N/A
A.9	E-mail address	N/A
A.10	Response Time (Days)	N/A

A.11	Parent Company	N/A
A.12	Members of the Management body	N/A
A.13	Business Activity	N/A
A.14	Parent Company Business Activity	N/A
A.15	Newly Established	N/A
A.16	Financial condition for the past three years	N/A
A.17	Financial condition since registration	N/A
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	Rome Blockchain Labs Inc
B.3	Legal form	Not available

B.4	Registered address	651 North Broad Street Suite 206 Middletown, DE 19709 United States
B.5	Head office	Not available
B.6	Registration Date	2021-09-30
B.7	Legal entity identifier	Not available
B.8	Another identifier required pursuant to applicable national law	Delaware identification: 6273212
B.9	Parent Company	Not available
B.10	Members of the Management body	N/A
B.11	Business Activity	Not available
B.12	Parent Company Business Activity	Not available
Part C- Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114		
C.1	Name	Payward Global Solutions LTD
C.2	Legal form	N/A

<table>
<tr><td>C.3</td><td>Registered address</td><td>N/A</td></tr>
<tr><td>C.4</td><td>Head office</td><td>N/A</td></tr>
<tr><td>C.5</td><td>Registration Date</td><td>2023-07-11</td></tr>
<tr><td>C.6</td><td>Legal entity identifier of the operator of the trading platform</td><td>9845003D98SCC2851458</td></tr>
<tr><td>C.7</td><td>Another identifier required pursuant to applicable national law</td><td>N/A</td></tr>
<tr><td>C.8</td><td>Parent Company</td><td>N/A</td></tr>
<tr><td>C.9</td><td>Reason for Crypto-Asset White Paper Preparation</td><td>Kraken seeks admission to trading of the QI token so as to be compliant with MiCA and in keeping with its mission to make available for trading to its clients a wide range of assets.</td></tr>
<tr><td>C.10</td><td>Members of the Management body</td><td>
<table>
<tr><th>Full Name</th><th>Business Address</th><th>Function</th></tr>
<tr><td>Shannon Kurtas</td><td>70 Sir John Rogerson's Quay, Dublin 2, Ireland</td><td>Board Member</td></tr>
<tr><td>Andrew Mulvenny</td><td>70 Sir John Rogerson's Quay, Dublin 2, Ireland</td><td>Board Member</td></tr>
<tr><td>Shane O'Brien</td><td>70 Sir John Rogerson's Quay,</td><td>Board Member</td></tr>
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</td></tr>
</table>

		Dublin 2, Ireland	
		Laura Walsh	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Board Member
		Michael Walsh	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Board Member
C.11	Operator Business Activity	PGSL is the operator of a Trading Platform for Crypto Assets, in accordance with Article 3(1)(18) of Regulation (EU) 2023/1114 (MiCA).
C.12	Parent Company Business Activity	Payward, Inc., a Delaware, USA corporation, is the parent company of a worldwide group of subsidiaries (the following paragraphs use the term "Payward" or "Payward Group" to refer to the group) collectively doing business as "Kraken." Payward's primary business is the operation of an online virtual asset platform that enables clients to buy and sell virtual assets on a spot basis, including the transfer of crypto-assets to and from external wallets. Payward, through its various affiliates, offers a number of other services and products, including: * A trading platform for futures contracts on virtual assets ("Kraken Derivatives"); * A platform for buying and selling NFTs; * An over-the-counter ("OTC") desk; * Extensions of margin to support spot trading of virtual assets; * A benchmark administrator; and * Staking services.
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
Part D- Information about the crypto-asset project		
D.1	Crypto-asset project name	BenQi
D.2	Crypto-assets name	N/A
D.3	Abbreviation	N/A
D.4	Crypto-asset project description	BENQI is a decentralized finance (DeFi) protocol deployed on the Avalanche blockchain. It provides two primary services: a non-custodial liquidity market for lending and borrowing digital assets, and a liquid staking platform that allows users to stake AVAX and receive sAVAX, a tokenized representation of staked AVAX with accrued rewards. The protocol also includes Ignite, an infrastructure layer for launching Avalanche validators with reduced capital requirements. QI is the platform's token that connects all components of the BENQI ecosystem. It enables holders to participate in the protocol's governance and validator delegation mechanisms.
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	**Developer / Platform Operator** Rome Blockchain Labs Inc. also serves as the primary development studio behind the BENQI protocol, including its lending markets, liquid staking module (sAVAX), and validator infrastructure (Ignite). The company is responsible for ongoing engineering, security audits, third-party integrations, and platform operations. Its principal place of business is: 651 North Broad Street, Suite 206, Middletown, DE 19709, United States. **Founding Management** • Dan Mgbor – Co-Founder & Operations Lead • Hansen Niu – Co-Founder & Strategy Lead

		• Jason Tuang – Co-Founder & DeFi Product Lead These individuals lead BENQI's engineering, risk management, and growth strategy. They also coordinate with infrastructure partners and community stakeholders during BENQI's transition toward decentralized governance.
D.6	Utility Token Classification	false
D.7	Key Features of Goods/Services for Utility Token Projects	N/A
D.8	Plans for the token	**Key milestones** (Q2–Q3 2021) Completed private and public token sales; (August 2021) Launched BENQI Lending Market on Avalanche; (November 2021) Deployed BENQI Liquid Staking and launched sAVAX; (2022) Integrated Chainlink oracles and risk management systems; (2023) Released Ignite validator infrastructure and veQI-powered Node Voting. **Next steps** Deploy full on-chain governance (including treasury and parameter control), introduce veQI locking enhancements, explore subnet deployment, and evaluate RWA integrations subject to community governance. Please refer to the project website for any further future milestones.
D.9	Resource Allocation	**Funding rounds** Raised around $9M in 2021 from private investors and public sale participants. Capital was used to support protocol development, audits, liquidity bootstrapping, and validator infrastructure. **Token allocation** 45% is allocated to Community Incentives, 15% to the Foundation Fund and 10% to Core Contributors
D.10	Planned Use of Collected Funds or Crypto-Assets	Funds collected through the private and public token sales were primarily allocated to protocol development, smart contract audits, infrastructure costs, and initial liquidity provisioning. A portion of reserves is earmarked for ongoing operations, including developer grants, ecosystem integrations, validator incentives, and risk management services. The Foundation Fund is intended to support long-term protocol growth,

		and future allocation of treasury resources may be subject to community governance once full on-chain control is implemented.
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	ATTR
E.2	Reasons for Public Offer or Admission to trading	Making secondary trading available to the consumers on the Kraken Trading platform in compliance with the MiCA regulatory framework
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 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	
E.13	Targeted Holders	ALL
E.14	Holder restrictions	N/A
E.15	Reimbursement Notice	N/A
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	N/A
E.25	Value Transfer Methods for Reimbursement	N/A
E.26	Right of Withdrawal	N/A
E.27	Transfer of Purchased crypto-assets	N/A
E.28	Transfer Time Schedule	N/A
E.29	Purchaser's Technical Requirements	N/A
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	Payward Global Solutions Ltd t/a Kraken.com
E.34	Trading Platforms Market Identifier Code (MIC)	PGSL
E.35	Trading Platforms Access	Kraken.com
E.36	Involved costs	N/A
E.37	Offer Expenses	N/A
E.38	Conflicts of Interest	All listings decisions made by Payward Global Solution Ltd are made independently by staff of the entity in line with internal policies. PGSL publishes a conflicts of interest disclosure on its website advising of potential conflicts that may arise.
E.39	Applicable law	Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether QI tokens qualify as right or property under the applicable law.
E.40	Competent court	Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts.
Part F - Information about the crypto-assets		
F.1	Crypto-Asset Type	QI is classified as a crypto-asset other than an asset referenced token or e-money token under MiCA, (EU) 2023/1114.

F.2	Crypto-Asset Functionality	QI's primary functions include (i) staking to receive BENQI Miles (veQI), which are used for Node Voting to influence validator delegation on Avalanche; (ii) access to validator launch infrastructure through the Ignite platform, where QI is required to participate in validator staking; and (iii) incentivization of user activity, including lending, borrowing, and staking, through liquidity mining and protocol reward programs. QI is also used as a collateral asset in isolated lending markets. While Node Voting governance is currently live, full on-chain governance over protocol upgrades and treasury allocation is planned for future phases.
F.3	Planned Application of Functionalities	All core functionalities of QI are currently live, including staking for veQI, Node Voting for validator delegation, and use within the Ignite validator launch platform. Planned future enhancements include the introduction of a QI locking mechanism for accelerated BENQI Miles accrual and the rollout of full on-chain governance features (e.g., protocol upgrades, treasury proposals). These features are expected to be implemented progressively but are not yet active.
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	NEWT
F.6	Crypto-Asset Characteristics	QI is a fungible token deployed on Avalanche C-Chain, adhering to the ERC-20 standard. It has 18 decimal places and a fixed total supply of 7,200,000,000 tokens minted at genesis. QI does not include built-in minting, burning, or rebasing mechanisms. It is freely transferable, compatible with all EVM-based tooling, and used within the BENQI protocol for staking, governance (via veQI), validator access (Ignite), and incentives. QI does not represent equity, redemption rights, or entitlement to financial returns.
F.7	Commercial name or trading name	Rome Blockchain Labs Inc
F.8	Website of the issuer	https://benqi.fi/

F.9	Starting date of offer to the public or admission to trading	2021-08-19
F.10	Publication date	2025-08-12
F.11	Any other services provided by the issuer	N/A
F.12	Identifier of operator of the trading platform	PGSL
F.13	Language or languages of the white paper	English
F.14	Digital Token Identifier	HZZKQKLNK
F.15	Functionally Fungible Group Digital Token Identifier	N/A
F.16	Voluntary data flag	False
F.17	Personal data flag	true
F.18	LEI eligibility	N/A

F.19	Home Member State	Ireland
F.20	Host Member States	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden
Part G - Information on the rights and obligations attached to the crypto-assets		
G.1	Purchaser Rights and Obligations	**Governance Rights** QI holders can participate in validator-related governance through the BENQI Miles (veQI) system, including voting on AVAX validator delegation via Node Voting. Full protocol-level governance (e.g., treasury control, proposal execution) is planned but not yet live. **Rewards and Utility** Holders may stake QI to receive veQI, which grants governance influence and access to protocol-integrated features such as validator staking through the Ignite platform. QI is also used for incentivizing lending, borrowing, and staking activity across the BENQI ecosystem. **Obligations** Holding QI does not impose any mandatory obligations. QI does not represent equity, debt, or claims on assets. Users must comply with applicable laws and BENQI's platform terms when using the token, including refraining from any illicit or unauthorized use.
G.2	Exercise of Rights and obligations	**Exercise of Governance** QI governance rights are currently limited to Node Voting, which allows holders to influence AVAX validator delegation using veQI (BENQI Miles). To participate, token holders must stake QI through the official BENQI interface to receive veQI, which accrues over time and determines voting power. Voting is conducted through BENQI's governance portal, and power is proportional to the amount and duration of QI staked. Full protocol governance, including proposal submission and treasury control, is not yet live and remains under the issuer's multisig. **Claiming Rewards** If staking or rewards features are offered, holders exercise their rights by locking or delegating QI through the sanctioned BENQI or Ignite interfaces to access validator staking or claim protocol incentives. All such actions are voluntary, and failure to participate simply means the holder forgoes those particular benefits. |

G.3	Conditions for modifications of rights and obligations	The rights and obligations attached to QI as described in this white paper reflect information available at the time of issuance. This white paper is issued by Kraken and does not constitute a commitment or guarantee by Benqi or any other party regarding future modifications. No promises, warranties, or assurances are made herein regarding future token functionality, and this section is provided solely for informational purposes.
G.4	Future Public Offers	No future public offers of QI have been announced by the team.
G.5	Issuer Retained Crypto-Assets	The issuer retains direct or indirect control over 70.0% of the total QI supply at genesis: 45% allocated to Community Incentives, 15% to the BENQI Foundation, and 10% to Core Contributors. While some of these allocations are being distributed over time (e.g., through liquidity mining or vesting contracts), they remain under the control of the issuer via multisig wallets and issuer-administered contracts. Until full protocol governance is implemented, many of these assets continue to be managed by the issuer or affiliated parties.
G.6	Utility Token Classification	false
G.7	Key Features of Goods/Services of Utility Tokens	false
G.8	Utility Tokens Redemption	N/A
G.9	Non-Trading request	This white paper reflects a request to admit the token to trading.
G.10	Crypto-Assets purchase or sale modalities	N/A
G.11	Crypto-Assets Transfer Restrictions	Kraken may, in accordance with applicable laws and internal policies and terms, impose restrictions on buyers and sellers of these tokens.

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	Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether QI tokens qualify as right or property under the applicable law.
G.19	Competent court	Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts.
Part H – information on the underlying technology		
H.1	Distributed ledger technology	N/A

H.2	Protocols and technical standards	The QI token is based on Avalanche C-Chain, which utilizes decentralized Distributed-Ledger Technology. This protocol provides the foundation for secure transactions and smart contracts. The ERC20 standard is a technical protocol for issuing and managing tokens, ensuring that the QI token is compatible with most wallets, exchanges, and decentralized applications (DApps).
H.3	Technology Used	The QI token is an ERC-20 fungible token deployed on Avalanche's C-Chain, which operates under the EVM-compatible Snowman standard. Avalanche's C-Chain is secured by the Avalanche consensus protocol and maintained by a decentralized network of validators staking AVAX on the platform's primary network. QI is used within smart contracts and is transferable through any standard EVM wallet infrastructure.
H.4	Consensus Mechanism	The QI token relies on Avalanche's Snowman consensus mechanism, a Proof-of-Stake protocol used by the Avalanche C-Chain for sequential block production and fast finality.
H.5	Incentive Mechanisms and Applicable Fees	The QI token relies on the existing incentive mechanisms and fee structures of the Avalanche network.
H.6	Use of Distributed Ledger Technology	false
H.7	DLT Functionality Description	N/A
H.8	Audit	true
H.9	Audit outcome	May 2021 Halborn audit (BENQI Liquidity Market contracts) • No Critical issues • No High issues • 1 Medium issue (acknowledged) • 5 Low issues (resolved) Feb 2022 Halborn audit (BENQI Liquid Staking contracts) • 4 Critical issues (resolved) • 1 High issue (resolved) • 2 Medium issues (resolved) • 1 Informational issue (acknowledged)

		Apr 2022 – Certora formal verification (StakedAVAX contracts) • No Critical issues • No High issues • No Medium issues • Formal properties verified Mar 2023 – Dedaub audit (Ignite validator contracts) • No Critical issues • 1 High issue (resolved) • 3 Medium issues (resolved) • 1 Informational issue (resolved)
Part J - Information on the suitability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
S.1	Name	Payward Global Solutions Limited
S.2	Relevant legal entity identifier	9845003D98SCC2851458
S.3	Name of the crypto-asset	BENQI
S.4	Consensus Mechanism	The Avalanche blockchain network employs a unique Proof-of-Stake consensus mechanism called Avalanche Consensus, which involves three interconnected protocols: Snowball, Snowflake, and Avalanche. Avalanche Consensus Process: 1. Snowball Protocol: - Random Sampling: Each validator randomly samples a small, constant-sized subset of other validators. - Repeated Polling: Validators repeatedly poll the sampled validators to determine the preferred transaction. - Confidence Counters: Validators maintain confidence counters for each transaction, incrementing them each time a sampled validator supports their preferred transaction.

		- Decision Threshold: Once the confidence counter exceeds a pre-defined threshold, the transaction is considered accepted. 2. Snowflake Protocol: - Binary Decision: Enhances the Snowball protocol by incorporating a binary decision process. Validators decide between two conflicting transactions. - Binary Confidence: Confidence counters are used to track the preferred binary decision. - Finality: When a binary decision reaches a certain confidence level, it becomes final. 3. Avalanche Protocol: - DAG Structure: Uses a Directed Acyclic Graph (DAG) structure to organize transactions, allowing for parallel processing and higher throughput. - Transaction Ordering: Transactions are added to the DAG based on their dependencies, ensuring a consistent order. - Consensus on DAG: While most Proof-of-Stake Protocols use a Byzantine Fault Tolerant (BFT) consensus, Avalanche uses the Avalanche Consensus, Validators reach consensus on the structure and contents of the DAG through repeated Snowball and Snowflake.
S.5	Incentive Mechanisms and Applicable Fees	Avalanche uses a consensus mechanism known as Avalanche Consensus, which relies on a combination of validators, staking, and a novel approach to consensus to ensure the network's security and integrity. 1. Validators: Staking: Validators on the Avalanche network are required to stake AVAX tokens. The amount staked influences their probability of being selected to propose or validate new blocks. Rewards: Validators earn rewards for their participation in the consensus process. These rewards are proportional to the amount of AVAX staked and their uptime and performance in validating transactions.

		Delegation: Validators can also accept delegations from other token holders. Delegators share in the rewards based on the amount they delegate, which incentivizes smaller holders to participate indirectly in securing the network. 2. Economic Incentives: Block Rewards: Validators receive block rewards for proposing and validating blocks. These rewards are distributed from the network's inflationary issuance of AVAX tokens. Transaction Fees: Validators also earn a portion of the transaction fees paid by users. This includes fees for simple transactions, smart contract interactions, and the creation of new assets on the network. 3. Penalties: - Slashing: Unlike some other PoS systems, Avalanche does not employ slashing (i.e., the confiscation of staked tokens) as a penalty for misbehavior.Instead, the network relies on the financial disincentive of lost future rewards for validators who are not consistently online or act maliciously. - Uptime Requirements: Validators must maintain a high level of uptime and correctly validate transactions to continue earning rewards. Poor performance or malicious actions result in missed rewards, providing a strong economic incentive to act honestly. Fees on the Avalanche Blockchain 1. Transaction Fees: - Dynamic Fees: Transaction fees on Avalanche are dynamic, varying based on network demand and the complexity of the transactions. This ensures that fees remain fair and proportional to the network's usage. - Fee Burning: A portion of the transaction fees is burned, permanently removing them from circulation. This deflationary mechanism helps to balance the inflation from block rewards and incentivizes token holders by potentially increasing the value of AVAX over time.

		2. Smart Contract Fees: Execution Costs: Fees for deploying and interacting with smart contracts are determined by the computational resources required. These fees ensure that the network remains efficient and that resources are used responsibly. 3. Asset Creation Fees: New Asset Creation: There are fees associated with creating new assets (tokens) on the Avalanche network. These fees help to prevent spam and ensure that only serious projects use the network's resources.
S.6	Beginning of the period to which the disclosure relates	2024-06-24
S.7	End of the period to which the disclosure relates	2025-06-24
S.8	Energy consumption	314.23286 kWh/a
S.9	Energy consumption sources and methodologies	The energy consumption of this asset is aggregated across multiple components: To determine the energy consumption of a token, the energy consumption of the network(s) avalanche is calculated first. For the energy consumption of the token, a fraction of the energy consumption of the network is attributed to the token, which is determined based on the activity of the crypto-asset within the network. When calculating the energy consumption, the Functionally Fungible Group Digital Token Identifier (FFG DTI) is used - if available - to determine all implementations of the asset in scope. The mappings are updated regularly, based on data of the Digital Token Identifier Foundation. The information regarding the hardware used and the number of participants in the network is based on assumptions that are verified with best effort using empirical data. In general, participants are assumed to be largely economically rational. As a precautionary principle, we make assumptions on the conservative side when in doubt, i.e. making higher estimates for the adverse impacts.