Sundog (SUNDOG) White paper

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

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		End of the period to which the disclosure relates Energy consumption Energy consumption sources and methodologies 29 29
01	Date of notification	2025-06-19
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



	1	-	
06 Sumi	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.	
Cuiiii	y		
07	Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	Warning This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto – asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The admission to trading of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to Union or national law.	
08	Characteristics of the crypto-asset	Sundog (SUNDOG) is a Tron-based fungible crypto-asset token. It is transferable on the Tron network and can be freely traded or held by participants. Its value derives solely from community adoption and market demand.	
09	Key information about the quality and quantity of the goods or services to which the utility tokens give access	N/A	
10			
	Key information about the offer to the public or admission to trading	Kraken seeks admission to trading of the SUNDOG 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	Part I – Information on risks		



l.1	Offer-Related Risks	General Risk Factors Associated with Crypto-Asset Offerings: The admission to trading of crypto-assets, including SUNDOG, is subject to general risks inherent to the broader cryptocurrency market.
		Market Volatility: The value of SUNDOG 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.
1.2	Issuer-Related Risks	The SUNDOG project's informal structure and lack of a formal legal entity present several issuer-related risks.
		Governance and Internal Control Risks: With an anonymous or pseudonymous team, there is limited transparency and accountability. This could lead to potential mismanagement or misalignment with community interests. The absence of formal governance frameworks increases uncertainty, as key decisions may be made without external oversight.
		Legal and Regulatory Risks: Because the project is not operated by a registered company, there is no clear legal entity accountable for SUNDOG. This could pose challenges if regulatory authorities seek compliance or if disputes arise, as holders might have limited recourse. Furthermore, changes in laws or enforcement could impact the project's ability to operate if it cannot meet regulatory requirements due to its decentralized structure.
1.3	Crypto-Assets-relate d Risks	Market Volatility: The crypto-asset market is subject to significant price volatility, which may affect the value of SUNDOG. 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. SUNDOG 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: The risk associated with the project not achieving its goals leading to lower than expected adoption and use within the ecosystem, the impact leading to a reduced utility and 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."
1.4	Project Implementation-Rela ted Risks	The implementation of the Sundog project may face challenges that could adversely affect its success. Operational Challenges: As a community-driven initiative without formal management, coordinating development, marketing, and community engagement can be difficult. The lack of a structured management process might result in inefficiencies or inconsistent progress.
		Team Continuity Risk: The project's progress depends on its contributors. If key community leaders leave the project or lose interest, there may be setbacks or discontinuation of certain project aspects.
1.5	Technology-Related Risks	Smart contract risks: SUNDOG 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: SUNDOG 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 SUNDOG.
		Risk of Cryptographic Vulnerabilities: Technological advancements, such as quantum computing, could pose potential risks to cryptocurrencies.
		Privacy: Transactions involving SUNDOG 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. Participants should be aware that 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.
1.6	Mitigation measures	Use of Established Standards: SUNDOG is implemented using a well-tested token standard, TRC20 on Tron, which has been widely used and vetted. By adhering to a standard protocol and not using unproven custom code where unnecessary, the project reduces the likelihood of unknown bugs.
Part A	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		
Δ. /	Another identifier	
	required pursuant to	
	Trequired parodant to	
	applicable national	
	law	N/A
		IN/A
A.8		
	Contact telephone	
	number	N/A
A.9		
	E-mail address	N/A
A 40		
A.10		
	Response Time	
	(Days)	N/A
A.11		
	Parent Company	N/A
A.12		
A.12		
	Members of the Management body	
	Iwanagement body	N/A
A.13		
	Business Activity	N/A
Λ 11		
A.14	Demant Courses	
	Parent Company Business Activity	
	Dusiness 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 tradin		the issuer, if different from the offeror or person seeking admission to
B.1	Issuer different from offeror or person seeking admission to trading	true
B.2	Name	Not available
B.3	Legal form	Not available
B.4	Registered address	Not available
B.5	Head office	Not available
B.6	Registration Date	Not available
B.7	Legal entity identifier	Not available



B.8		
	Another identifier required pursuant to applicable national	
	law	Not available
B.9		
	Parent Company	Not available
B.10		
	Members of the Management body	Not available
B.11		
	Business Activity	Not available
B.12		
	Parent Company Business Activity	Not available
D4 C		
		the operator of the trading platform in cases where it draws up the nd information about other persons drawing the crypto-asset white paper

C.1		
	Name	Payward Global Solutions LTD
C.2		
	Legal form	N/A
C.3		
	Registered address	N/A
C.4		
	Head office	N/A
C.5		
	Registration Date	11-07-2023



C.6	Legal entity identifier of the operator of the trading platform	9845003D98SCC2851458		
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		o trading of the SUNDOG to with its mission to make ava ets.	· · · · · · · · · · · · · · · · · · ·
C.10				
	Members of the Management body	Full Name	Business Address	Function
		Shannon Kurtas	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Board Member
		Andrew Mulvenny	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Board Member
		Shane O'Brien	70 Sir John Rogerson's Quay, Dublin 2, Ireland	Board Member
		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
0.11				
C.11	Operator Business Activity	•	Trading Platform for Crypto on (EU) 2023/1114 (MiCA).	Assets, in accordance with
C.12	Parent Company Business Activity	worldwide group of subsidi "Payward" or "Payward Gro	, USA corporation, is the pa aries (the following paragra oup" to refer to the group) c mary business is the opera	phs use the term collectively doing business



		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
	ļ	
Part D	- Information about t	he crypto-asset project
D.1	Crypto-asset project	
		Sundog
D.2	Crypto-assets name	Sundog
	1	ı



D.3		
	Abbreviation	SUNDOG
D.4	Crypto-asset project description	Sundog is a simple meme coin created on the Tron blockchain via the SunPump fair-launch platform. It has no underlying utility or functionality apart from serving as a humorous, community-driven token intended for social commentary and entertainment within the Tron community.
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	The Sundog project is developed and maintained by a group of anonymous or pseudonymous contributors from the community. No specific individuals or legal entities have been officially disclosed as core team members.
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	Please refer to project team website for any further information regarding future milestone
D.9	Resource Allocation	The Sundog project has not publicly detailed any specific financial resources allocated to the project. There was no traditional fundraising round (such as an ICO/ITO) for SUNDOG, and no treasury or budget disclosures have been made. Any development or marketing efforts so far appear to be volunteer-driven or informally supported by community donations. As a result, there is no verified information on funds earmarked for project development, liquidity, or other purposes.
D.10		
	Planned Use of Collected Funds or	
	Crypto-Assets	N/A



Part E	E - Information about t	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
		IN/A
E.12	Total Number of Offered/Traded crypto-assets	1 000 000 000 maximum supply
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



F 00		
E.23	Safeguarding Arrangements for Offered Funds/crypto-assets	
	i unus/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



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E.33		
	Trading Platforms	
	Iname	laura .
		N/A
E.34		
	Trading Platforms	
	Market Identifier	
	Code (MIC)	l
	oodo (iiiio)	N/A
E.35		
	Trading Platforms	
	Access	l
	7 100000	N/A
E.36		
	Involved costs	
	Involved doors	N/A
E.37		
	Offer Expenses	
	Oner Expenses	N/A
E.38		All listings decisions made by Payward Global Solution Ltd are made
	Conflicts of Interest	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		Any dispute relating to this white paper shall be governed by and construed and
E.39		enforced in accordance with the laws of Ireland without regard to conflict of law
	Applicable 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
		· · ·
		SUNDOG tokens qualify as right or property under the applicable law.
E.40		Any disputes or claims griging out of this white paper will be subject to the
	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 t	the crypto-assets
F.1		
	Crypto-Asset Type	SUNDOG is classified as a crypto-asset other than an asset referenced token or
	Orypio / looci Type	e-money token under MiCA, (EU) 2023/1114.
F.2		SUNDOG is a standard TRC20 token on the Tron blockchain, which means its
	Crypto-Asset	core functionality is to serve as a transferable and tradable digital asset. Holders
	Functionality	of SUNDOG can send and receive the token using Tron-compatible wallets, and
	unoutrailly	use SUNDOG in transactions or smart contracts that accept TRC20 tokens.
		Currently, its primary function is as a community and meme token for trading and
		holding.
	l	1



	1	<u> </u>
F.3	Planned Application of Functionalities	There are currently no known additional token functionalities pending activation or launch for SUNDOG.
of the	crypto-asset white p	eteristics of the crypto-asset, including the data necessary for classification aper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as th paragraph 8 of that Article
F.4	Type of white paper	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	SUNDOG is a fungible digital token with a fixed total supply of 1 000 000 000 that was defined at the time of its creation.
F.7	Commercial name or trading name	No dedicated commercial entity exists for the project.
F.8	Website of the issuer	Not available
F.9	Starting date of offer to the public or admission to trading	2024-08-15
F.10	Publication date	2025-07-17
F.11	Any other services provided by the issuer	N/A



	ī	
F.12		
	Identifier of operator	
	of the trading	
	platform	
	production:	PGSL
F.13		
	Language or	
	languages of the	
	white paper	
	' '	English
F.14		
	Digital Token	
	Identifier	Not available
		INOL available
F.15		
	Functionally Fungible	
	Group Digital Token	
	Identifier	N/A
		IV/A
F.16		
	Voluntary data flag	Mandatory
		inalitatory
F.17		
	Personal data flag	false
F 40		
F.18		
	LEI eligibility	N/A
F.19		
Jr. 19	<u>.</u>	
	Home Member State	Ireland
F.20		Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia,
1 .20		Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania,
	Host Member States	Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia,
		Slovenia, Spain, Sweden, Iceland, Liechtenstein, Norway
		Jovenia, Opain, Oweden, Ideianu, Liednienstein, Norway
Part G	- Information on the	rights and obligations attached to the crypto-assets
G.1		Transferability and Trading:
	Durchasar Diahta	Holders have the ability to transfer their SUNDOG tokens to others (on-chain) or
	Purchaser Rights	to trade them on available markets at will.
	and Obligations	
		Obligations of Holders:
	•	



		There are no mandatory obligations imposed on SUNDOG purchasers.
G.2		
	Exercise of Rights and obligations	The primary right associated with SUNDOG – the ability to transfer or trade the token – is exercised through standard blockchain transactions.
G.3	Conditions for modifications of rights and obligations	The rights and obligations attached to SUNDOG 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 Sundog 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	The Sundog project has not planned any future public offerings of the SUNDOG token.
G.5	Issuer Retained Crypto-Assets	Not available
G.6	Utility Token Classification	false
G.7	Key Features of Goods/Services of Utility Tokens	N/A
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.



	r		
G.12	Supply Adjustment Protocols	false	
G.13			
0.10	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 SUNDOG 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	Part H – information on the underlying technology		
H.1	Distributed ledger technology	SUNDOG is implemented on Tron. Tron is a public blockchain that is EVM-compatible and uses a Delegated Proof-of-Stake (DPoS) consensus mechanism maintained by a set of Super Representatives.	



S.3	Name of the crypto-asset	SUNDOG	
S.2	Relevant legal entity identifier	9845003D98SCC2851458	
S.1	Name	Payward Global Solutions Limited	
	Part J - Information on the suitability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
H.9	Audit outcome	N/A	
	Audit	false	
H.8			
H.7	DLT Functionality Description	N/A	
H.6	Use of Distributed Ledger Technology	false	
H.5	Incentive Mechanisms and Applicable Fees	SUNDOG relies on the existing incentive mechanisms and fee structures of the TRON blockchain.	
H.4	Consensus Mechanism	Tron uses Delegated Proof-of-Stake (DPoS), where 27 Super Representatives are elected by TRX holders to produce blocks. This model allows for rapid block production, typically every 3 seconds, resulting in fast confirmation for SUNDOG transactions.	
H.3	Technology Used	The SUNDOG token uses the existing TRC20 token standard on Tron.	
		TRC-20 Token Standard: The TRC-20 standard is a technical protocol for issuing and managing tokens, ensuring that the SUNDOG token is compatible with wallets, exchanges, and decentralized applications (DApps).	
H.2	Protocols and technical standards	Tron Blockchain Protocol: The SUNDOG token is based on the Tron protocol, which utilizes decentralized Distributed-Ledger Technology. This protocol provides the foundation for secure transactions and smart contracts.	



S.4	Consensus Mechanism	The Tron blockchain operates on a Delegated Proof of Stake (DPoS) consensus mechanism, designed to improve scalability, transaction speed, and energy efficiency.
		 Core Components: Delegated Proof of Stake (DPoS): Tron uses DPoS, where token holders vote for a group of delegates known as Super Representatives (SRs)who are responsible for validating transactions and producing new blocks on the network. Token holders can vote for SRs based on their stake in the Tron network, and the top 27 SRs (or more, depending on the protocol version) are selected to participate in the block production process. SRs take turns producing blocks, which are added to the blockchain. This is done on a rotational basis to ensure decentralization and prevent control by a small group of validators. Block Production: The Super Representatives generate new blocks and confirm transactions. The Tron blockchain achieves block finality quickly, with block production occurring every 3 seconds, making it highly efficient and capable of processing thousands of transactions per second. Voting and Governance: Tron's DPoS system also allows token holders to vote on important network decisions, such as protocol upgrades and changes to the system's parameters. Voting power is proportional to the amount of TRX (Tron's native token) that a user holds and chooses to stake. This provides a governance system where the community can actively participate in decision-making. Super Representatives: The Super Representatives play a crucial role in maintaining the security and stability of the Tron blockchain. They are responsible for validating transactions, proposing new blocks, and ensuring the overall functionality of the network. Super Representatives are incentivized with block rewards (newly minted TRX tokens) and transaction fees for their work.
S.5	Incentive Mechanisms and Applicable Fees	The Tron blockchain uses a Delegated Proof of Stake (DPoS) consensus mechanism to secure its network and incentivize participation. Incentive Mechanism:
		Super Representatives (SRs) Rewards: Block Rewards: Super Representatives (SRs), who are elected by TRX holders, are rewarded for producing blocks. Each block they produce comes with a block reward in the form of TRX tokens. Transaction Fees: In addition to block rewards, SRs receive transaction fees for validating transactions and including them in



		blocks. This ensures they are incentivized to process transactions efficiently. 2. Voting and Delegation: - TRX Staking: TRX holders can stake their tokens and vote for Super Representatives (SRs). When TRX holders vote, they delegate their voting power to SRs, which allows SRs to earn rewards in the form of newly minted TRX tokens. - Delegator Rewards: Token holders who delegate their votes to an SR can also receive a share of the rewards. This means delegators share in the block rewards and transaction fees that the SR earns. - Incentivizing Participation: The more tokens a user stakes, the more voting power they have, which encourages participation in governance and network security. 3. Incentive for SRs: SRs are also incentivized to maintain the health and performance of the network. Their reputation and continued election depend on their ability to produce blocks consistently and efficiently process transactions. Applicable Fees: 1. Transaction Fees:
		 Fee Calculation: Users must pay transaction fees to have their transactions processed. The transaction fee varies based on the complexity of the transaction and the network's current demand. This is paid in TRX tokens. Transaction Fee Distribution: Transaction fees are distributed to Super Representatives (SRs), giving them an ongoing income to maintain and support the network. Storage Fees: Tron charges storage fees for data storage on the blockchain. This includes storing smart contracts, tokens, and other data on the network. Users are required to pay these fees in TRX tokens to store data. Energy and Bandwidth: Energy: Tron uses a resource model that allows users to access network resources like bandwidth and energy through staking. Users who stake their TRX tokens receive \energy
S.6	Beginning of the period to which the disclosure relates	2024-05-28



S.7	End of the period to which the disclosure relates	2025-05-28
S.8	Energy consumption	569.26769 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) tron 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.