

# MiCA White Paper

## Notcoin

### (NOT)

Version 1.1  
Nov 2025

White Paper in accordance with Markets in Crypto Assets Regulation (MiCAR)  
for the European Economic Area (EEA).

Purpose: seeking admission to trading EEA.

Prepared and Filed by LCX.com

NOTE: THIS CRYPTO-ASSET WHITE PAPER HAS NOT BEEN APPROVED BY ANY COMPETENT AUTHORITY IN ANY MEMBER STATE OF THE EUROPEAN ECONOMIC AREA. THE PERSON SEEKING ADMISSION TO TRADING IS SOLELY RESPONSIBLE FOR THE CONTENT OF THIS CRYPTO-ASSET WHITE PAPER ACCORDING TO THE EUROPEAN ECONOMIC AREA'S MARKETS IN CRYPTO-ASSET REGULATION (MICA).

This white paper has been prepared in accordance with the requirements set forth in Commission Implementing Regulation (EU) 2024/2984, ensuring that all relevant reporting formats, content specifications, and machine-readable structures outlined in Annex I of this regulation have been fully mapped and implemented, particularly reflected through the Recitals, to enable proper notification under the Markets in Crypto-Assets Regulation (MiCAR).

#### Copyright:

This White Paper is under **copyright** of LCX AG Liechtenstein and may not be used, copied, or published by any third party without explicit written permission from LCX AG.

## 00 TABLE OF CONTENT

<b>COMPLIANCE STATEMENTS</b>	<b>6</b>
<b>SUMMARY</b>	<b>7</b>
<b>A. PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING</b>	<b>9</b>
A.1 Name	9
A.2 Legal Form	9
A.3 Registered Address	9
A.4 Head Office	9
A.5 Registration Date	9
A.6 Legal Entity Identifier	9
A.7 Another Identifier Required Pursuant to Applicable National Law	9
A.8 Contact Telephone Number	9
A.9 E-mail Address	9
A.10 Response Time (Days)	9
A.11 Parent Company	9
A.12 Members of the Management Body	9
A.13 Business Activity	9
A.14 Parent Company Business Activity	10
A.15 Newly Established	10
A.16 Financial Condition for the past three Years	10
A.17 Financial Condition Since Registration	10
<b>B. PART B - INFORMATION ABOUT THE ISSUER, IF DIFFERENT FROM THE OFFEROR OR PERSON SEEKING ADMISSION TO TRADING</b>	<b>11</b>
B.1 Issuer different from offeror or person seeking admission to trading	11
B.2 Name	11
B.3 Legal Form	11
B.4 Registered Address	11
B.5 Head Office	11
B.6 Registration Date	11
B.7 Legal Entity Identifier	11
B.8 Another Identifier Required Pursuant to Applicable National Law	11
B.9 Parent Company	11
B.10 Members of the Management Body	11
B.11 Business Activity	11
B.12 Parent Company Business Activity	11
<b>C. 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</b>	<b>12</b>
C.1 Name	12
C.2 Legal Form	12
C.3 Registered Address	12
C.4 Head Office	12
C.5 Registration Date	12
C.6 Legal Entity Identifier	12
C.7 Another Identifier Required Pursuant to Applicable National Law	12

C.8 Parent Company	12
C.9 Reason for Crypto-Asset White Paper Preparation	12
C.10 Members of the Management Body	12
C.11 Operator Business Activity	12
C.12 Parent Company Business Activity	13
C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph MiCA	13
C.14 Reason for drawing up the white paper under Article 6 (1) second subparagraph MiCA	13
<b>D. PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT</b>	<b>14</b>
D.1 Crypto-Asset Project Name	14
D.2 Crypto-Assets Name	14
D.3 Abbreviation	14
D.4 Crypto-Asset Project Description	14
D.5 Details of all persons involved in the implementation of the crypto-asset project	14
D.6 Utility Token Classification	14
D.7 Key Features of Goods/Services for Utility Token Projects	14
D.8 Plans for the Token	15
D.9 Resource Allocation	15
D.10 Planned Use of Collected Funds or Crypto-Assets	15
<b>E. PART E - INFORMATION ABOUT THE OFFER TO THE PUBLIC OF CRYPTO-ASSETS OR THEIR ADMISSION TO TRADING</b>	<b>16</b>
E.1 Public Offering or Admission to Trading	16
E.2 Reasons for Public Offer or Admission to Trading	16
E.3 Fundraising Target	16
E.4 Minimum Subscription Goals	16
E.5 Maximum Subscription Goal	16
E.6 Oversubscription Acceptance	16
E.7 Oversubscription Allocation	16
E.8 Issue Price	16
E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price	16
E.10 Subscription Fee	16
E.11 Offer Price Determination Method	16
E.12 Total Number of Offered/Traded Crypto-Assets	16
E.13 Targeted Holders	17
E.14 Holder Restrictions	17
E.15 Reimbursement Notice	17
E.16 Refund Mechanism	17
E.17 Refund Timeline	17
E.18 Offer Phases	17
E.19 Early Purchase Discount	17
E.20 Time-Limited Offer	17
E.21 Subscription Period Beginning	17
E.22 Subscription Period End	17
E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets	17
E.24 Payment Methods for Crypto-Asset Purchase	17
E.25 Value Transfer Methods for Reimbursement	17
E.26 Right of Withdrawal	17
E.27 Transfer of Purchased Crypto-Assets	17

E.28 Transfer Time Schedule	17
E.29 Purchaser's Technical Requirements	17
E.30 Crypto-asset service provider (CASP) name	18
E.31 CASP identifier	18
E.32 Placement Form	18
E.33 Trading Platforms name	18
E.34 Trading Platforms Market Identifier Code (MIC)	18
E.35 Trading Platforms Access	18
E.36 Involved Costs	18
E.37 Offer Expenses	18
E.38 Conflicts of Interest	18
E.39 Applicable Law	18
E.40 Competent Court	18
<b>F. PART F - INFORMATION ABOUT THE CRYPTO-ASSETS</b>	<b>19</b>
F.1 Crypto-Asset Type	19
F.2 Crypto-Asset Functionality	19
F.3 Planned Application of Functionalities	19
F.4 Type of white paper	19
F.5 The type of submission	19
F.6 Crypto-Asset Characteristics	19
F.7 Commercial name or trading name	19
F.8 Website of the issuer	19
F.9 Starting date of offer to the public or admission to trading	19
F.10 Publication date	19
F.11 Any other services provided by the issuer	19
F.12 Language or languages of the white paper	19
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	19
F.14 Functionally Fungible Group Digital Token Identifier, where available	19
F.15 Voluntary data flag	19
F.16 Personal data flag	19
F.17 LEI eligibility	20
F.18 Home Member State	20
F.19 Host Member States	20
<b>G. PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS</b>	<b>21</b>
G.1 Purchaser Rights and Obligations	21
G.2 Exercise of Rights and Obligation	21
G.3 Conditions for Modifications of Rights and Obligations	21
G.4 Future Public Offers	21
G.5 Issuer Retained Crypto-Assets	21
G.6 Utility Token Classification	21
G.7 Key Features of Goods/Services of Utility Tokens	21
G.8 Utility Tokens Redemption	21
G.9 Non-Trading Request	21
G.10 Crypto-Assets Purchase or Sale Modalities	21
G.11 Crypto-Assets Transfer Restrictions	21

G.12 Supply Adjustment Protocols	21
G.13 Supply Adjustment Mechanisms	21
G.14 Token Value Protection Schemes	22
G.15 Token Value Protection Schemes Description	22
G.16 Compensation Schemes	22
G.17 Compensation Schemes Description	22
G.18 Applicable Law	22
G.19 Competent Court	22
<b>H. PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY</b>	<b>23</b>
H.1 Distributed ledger technology	23
H.2 Protocols and Technical Standards	23
H.3 Technology Used	23
H.4 Consensus Mechanism	23
H.5 Incentive Mechanisms and Applicable Fees	23
H.6 Use of Distributed Ledger Technology	23
H.7 DLT Functionality Description	24
H.8 Audit	24
H.9 Audit Outcome	24
<b>I. PART I – INFORMATION ON RISKS</b>	<b>25</b>
I.1 Offer-Related Risks	25
I.2 Issuer-Related Risks	25
I.3 Crypto-Assets-Related Risks	25
I.4 Project Implementation-Related Risks	25
I.5 Technology-Related Risks	25
I.6 Mitigation Measures	25
<b>J. PART J – INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS</b>	<b>26</b>
J.1 Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism	26
J.2 Supplementary information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism	27

**01      DATE OF NOTIFICATION**

2025-11-17

**COMPLIANCE STATEMENTS**

- 02      This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Economic Area. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

Where relevant in accordance with Article 6(3), second subparagraph of Regulation (EU) 2023/1114, reference shall be made to 'person seeking admission to trading' or to 'operator of the trading platform' instead of 'offeror'.

- 03      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      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      Not Applicable
- 06      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**

Name & Symbol: Notcoin, NOT.

Blockchain / Technical Base: Built on The Open Network (TON).

Origin / Use Case:

It started as a Telegram mini-game ("tap-to-earn" / clicker) where users earn in-game points by tapping a virtual coin. Later these in-game coins were converted into real NOT tokens.

Supply:

Total/capped supply ~ 102,456,956,810 NOT

Circulating Supply upon Listing:

The entire supply was unlocked from day one (100%), though not all tokens enter the market/trading immediately.

Mechanics / Features:

Tap-to-earn game mechanics.

Energy system limiting tapping, boosts, leaderboards, social / referral systems.

"Explore" features: users can explore Web3 projects/products and earn NOT.

Distribution Philosophy:

Heavily community-driven / decentralized distribution rather than VC/private sale. A large share allocated to users, especially early participants ("miners", voucher holders, in-game earners).

### **09 Not applicable**

## 10 Key information about the offer to the public or admission to trading

Here are the key information about the Notcoin (NOT):

<i>Total offer amount</i>	Not applicable
<i>Total number of tokens to be offered to the public</i>	Not Applicable
<i>Subscription period</i>	Not Applicable
<i>Minimum and maximum subscription amount</i>	Not Applicable
<i>Issue price</i>	Not Applicable
<i>Subscription fees (if any)</i>	Not Applicable
<i>Target holders of tokens</i>	Not Applicable
<i>Description of offer phases</i>	Not Applicable
<i>CASP responsible for placing the token (if any)</i>	Not Applicable
<i>Form of placement</i>	Not Applicable
<i>Admission to trading</i>	LCX AG, Herrengasse 6, 9490 Vaduz, Liechtenstein



## **A. PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING**

### **A.1 Name**

LCX

### **A.2 Legal Form**

AG

### **A.3 Registered Address**

Herrengasse 6, 9490 Vaduz, Liechtenstein

### **A.4 Head Office**

Herrengasse 6, 9490 Vaduz, Liechtenstein

### **A.5 Registration Date**

24.04.2018

### **A.6 Legal Entity Identifier**

529900SN07Z6RTX8R418

### **A.7 Another Identifier Required Pursuant to Applicable National Law**

FL-0002.580.678-2

### **A.8 Contact Telephone Number**

+423 235 40 15

### **A.9 E-mail Address**

legal@lcx.com

### **A.10 Response Time (Days)**

020

### **A.11 Parent Company**

Not applicable

### **A.12 Members of the Management Body**

Full Name	Business Address	Function
Monty C. M. Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	President of the Board
Katarina Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	Board Member
Anurag Verma	Herrengasse 6, 9490 Vaduz, Liechtenstein	Director of Technology

### **A.13 Business Activity**

LCX provides various crypto-asset services under Liechtenstein's Token and Trusted Technology Service Provider Act ("Token- und Vertrauenswürdige Technologie-Dienstleister-Gesetz" in short "TVTG") also known as the Blockchain Act. These include custody and administration of crypto-assets, offering secure storage for clients' assets and private keys. LCX operates a trading platform, facilitating the matching of buy and sell orders for crypto-assets. It enables both crypto-to-fiat and crypto-to-crypto exchanges, ensuring compliance with AML and KYC regulations. LCX also supports token placements, marketing crypto-assets on behalf of offerors.

Under MiCA, LCX is classified as a Crypto-Asset Service Provider (CASP). LCX is not yet formally supervised under MiCA until the license is granted by the competent authority.

Under the TVTG framework, LCX provides:

- TT Depositary – Custody and safekeeping of crypto-assets.
- TT Trading Platform Operator – Operation of a regulated crypto-asset exchange.
- TT Exchange Service Provider – Crypto-to-fiat and crypto-to-crypto exchange.
- Token Issuer – Marketing and distribution of tokens.
- TT Transfer Service Provider – Crypto-asset transfers between ledger addresses.
- Token Generator & Tokenization Service Provider – Creation and issuance of tokens.
- Physical Validator – Enforcement of token-based rights on TT systems.
- TT Verification & Identity Service Provider – Legal capacity verification and identity registration.
- TT Price Service Provider – Providing aggregated crypto-asset price information.

#### **A.14 Parent Company Business Activity**

Not applicable

#### **A.15 Newly Established**

false

#### **A.16 Financial Condition for the past three Years**

LCX AG has a strong capital base, with CHF 1 million (approx. 1,126,000 USD) in share capital (Stammkapital) and a solid equity position (Eigenkapital) in 2023. The company has experienced fluctuations in financial performance over the past three years, reflecting the dynamic nature of the crypto market. While LCX AG recorded a loss in 2022, primarily due to a market downturn and a security breach, it successfully covered the impact through reserves. The company has remained financially stable, achieving revenues and profits in 2021, 2023 and 2024 while maintaining break-even operations.

In 2023 and 2024, LCX AG strengthened its operational efficiency, expanded its business activities, and upheld a stable financial position. Looking ahead to 2025, the company anticipates positive financial development, supported by market uptrends, an inflow of customer funds, and strong business performance. Increased adoption of digital assets and service expansion are expected to drive higher revenues and profitability, further reinforcing LCX AG's financial position.

#### **A.17 Financial Condition Since Registration**

LCX AG has been financially stable since its registration, supported by CHF 1 million in share capital (Stammkapital) and continuous business growth. Since its inception, the company has expanded its operations, secured multiple regulatory registrations, and established itself as a key player in the crypto and blockchain industry.

While market conditions have fluctuated, LCX AG has maintained strong revenues and break-even operations. The company has consistently reinvested in its platform, technology, and regulatory compliance, ensuring long-term sustainability. The LCX Token has been a fundamental part of the ecosystem, with a market capitalization of approximately 200 million USD and an all-time high exceeding 500 million USD in 2022. Looking ahead, LCX AG anticipates continued financial growth, driven by market uptrends, increased adoption of digital assets, and expanding business activities.

## **B. 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**

Open Builders

### **B.3 Legal Form**

Not Available

### **B.4 Registered Address**

Not Available

### **B.5 Head Office**

London

### **B.6 Registration Date**

Not applicable

### **B.7 Legal Entity Identifier**

Not applicable

### **B.8 Another Identifier Required Pursuant to Applicable National Law**

Not applicable

### **B.9 Parent Company**

Not Available

### **B.10 Members of the Management Body**

- Sasha Plotinov: Founder
- Sergey Chikirev: Co-Founder

### **B.11 Business Activity**

Unknown

### **B.12 Parent Company Business Activity**

Unknown

**C. 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**

LCX AG

**C.2 Legal Form**

AG

**C.3 Registered Address**

Herrengasse 6, 9490 Vaduz, Liechtenstein

**C.4 Head Office**

Herrengasse 6, 9490 Vaduz, Liechtenstein

**C.5 Registration Date**

24.04.2018

**C.6 Legal Entity Identifier**

529900SN07Z6RTX8R418

**C.7 Another Identifier Required Pursuant to Applicable National Law**

FL-0002.580.678-2

**C.8 Parent Company**

Not Applicable

**C.9 Reason for Crypto-Asset White Paper Preparation**

LCX is preparing this MiCA-compliant whitepaper for NOT to enhance transparency, regulatory clarity, and investor confidence. While NOT has its classification as “Other Crypto Asset,” LCX is providing this document to support its role as a Crypto-Asset Service Provider (CASP) and ensure compliance with MiCA regulations in facilitating NOT trading on its platform.

**C.10 Members of the Management Body**

Full Name	Business Address	Function
Monty C. M. Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	President of the Board
Katarina Metzger	Herrengasse 6, 9490 Vaduz, Liechtenstein	Board Member
Anurag Verma	Herrengasse 6, 9490 Vaduz, Liechtenstein	Director of Technology

**C.11 Operator Business Activity**

LCX provides various crypto-asset services under Liechtenstein’s Token and Trusted Technology Service Provider Act (“Token- und Vertrauenswürdige Technologie-Dienstleister-Gesetz” in short “TVTG”) also known as the Blockchain Act. These include custody and administration of crypto-assets, offering secure storage for clients’ assets and private keys. LCX operates a trading platform, facilitating the matching of buy and sell orders for crypto-assets. It enables both crypto-to-fiat and crypto-to-crypto exchanges, ensuring compliance with AML and KYC regulations. LCX also supports token placements, marketing crypto-assets on behalf of offerors.

Under MiCA, LCX is classified as a Crypto-Asset Service Provider (CASP).

Under the TVTG framework, LCX provides:

- TT Depositary – Custody and safekeeping of crypto-assets.
- TT Trading Platform Operator – Operation of a regulated crypto-asset exchange.
- TT Exchange Service Provider – Crypto-to-fiat and crypto-to-crypto exchange.
- Token Issuer – Marketing and distribution of tokens.
- TT Transfer Service Provider – Crypto-asset transfers between ledger addresses.
- Token Generator & Tokenization Service Provider – Creation and issuance of tokens.
- Physical Validator – Enforcement of token-based rights on TT systems.
- TT Verification & Identity Service Provider – Legal capacity verification and identity registration.
- TT Price Service Provider – Providing aggregated crypto-asset price information.

**C.12 Parent Company Business Activity**

Not Applicable

**C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph MiCA**

Not Applicable

**C.14 Reason for drawing up the white paper under Article 6 (1) second subparagraph MiCA**

Not Applicable

## **D. PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT**

### **D.1 Crypto-Asset Project Name**

Notcoin

### **D.2 Crypto-Assets Name**

NOT

### **D.3 Abbreviation**

NOT

### **D.4 Crypto-Asset Project Description**

Developer / Team: Developed by Open Builders with alignment to the TON ecosystem.

Launch Timeline: Closed beta in November 2023 on Telegram and official public launch / major token announcement on 1 January 2024.

User Growth / Reach: Very rapid adoption. For example, >5 million players in the first week after public launch. Within a short time, tens of millions of users.

Purpose / Goal: To serve as a GameFi / SocialFi gateway — bringing people who are non-crypto or only casual users into Web3, via gaming, social tasks, exploring Web3 products. It acts as a bridge between casual play and crypto token ownership.

### **D.5 Details of all persons involved in the implementation of the crypto-asset project**

These people/entities collaborate to maintain and improve the NOT token ecosystem:

Full Name	Business Address	Function
Sasha Plotinov	<i>Not Applicable</i>	Founder
Sergey Chikirev	<i>Not Applicable</i>	Co-Founder
TON Foundation	<i>Sielva Management SA, Gubelstrasse 11, 6300 Zug, Switzerland</i>	Blockchain related operations and also hosts their application over telegram.

### **D.6 Utility Token Classification**

False

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

Not Applicable

### **D.8 Plans for the Token**

The project envisions NOT as a gateway for onboarding users into TON-based applications. Future plans include expanding its use cases in partner applications, social mini-apps, and gaming ecosystems, while enabling liquidity on decentralized and centralized exchanges.

### **D.9 Resource Allocation**

Miners / Early Participants (in-game players, voucher-holders): 78%

Ecosystem Fund: 9%

Community Incentives: 5%

Development: 5%

Launchpool: 3%

#### **D.10 Planned Use of Collected Funds or Crypto-Assets**

This is a bit less clear due to limited or modest transparency in some sources, but here's what is known / reported:

Notcoin did not have traditional venture capital / private funding rounds (or at least, such rounds are very low or non-dominant). So the project is less about raising funds via token sales and more about distributing tokens to users.

Some funds / tokens are allocated for ecosystem building: that includes community incentives, development, ecosystem fund. These are meant to pay for ongoing development of features, game improvements, maintenance, marketing/community efforts.

Staking & Rewards: Some tokens / mechanisms are intended for staking rewards, encouraging holding, engagement. Also campaigns via exchanges / launchpools used for community incentives.

Explore / Web3 Outreach: The "Explore" feature is part of the plan: companies and Web3 projects can buy rewards pools, pay to place tasks or content that users interact with, thereby using NOT as an incentive. This likely uses part of the ecosystem / community incentive budget.

## **E. 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**

LCX is filing a MiCA-compliant whitepaper for NOT to enhance transparency, regulatory clarity, and investor confidence. While NOT is classified as “Other Crypto-Assets” under MiCA, this initiative supports compliance readiness and aligns with MiCA’s high disclosure standards. By doing so, LCX strengthens its position as a regulated exchange, ensuring a trustworthy and transparent trading environment for NOT within the EU’s evolving regulatory framework. Additionally, this filing facilitates market access and institutional adoption by removing uncertainty for institutional investors and regulated entities seeking to engage with NOT in a compliant manner. It further supports the broader market adoption and integration of NOT into the regulated financial ecosystem, reinforcing LCX’s role in shaping compliant and transparent crypto markets.

### **E.3 Fundraising Target**

Not applicable

### **E.4 Minimum Subscription Goals**

Not applicable

### **E.5 Maximum Subscription Goal**

Not applicable

### **E.6 Oversubscription Acceptance**

Not applicable

### **E.7 Oversubscription Allocation**

Not applicable

### **E.8 Issue Price**

Not applicable

### **E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price**

Not applicable

### **E.10 Subscription Fee**

Not applicable

### **E.11 Offer Price Determination Method**

Not applicable

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

Total supply of NOT tokens is 102,456,956,907 NOT

### **E.13 Targeted Holders**

ALL

### **E.14 Holder Restrictions**

Not applicable

### **E.15 Reimbursement Notice**

Not applicable



- E.16 Refund Mechanism**  
Not applicable
- E.17 Refund Timeline**  
Not applicable
- E.18 Offer Phases**  
Not applicable
- E.19 Early Purchase Discount**  
Not applicable
- E.20 Time-Limited Offer**  
Not applicable
- E.21 Subscription Period Beginning**  
Not applicable
- E.22 Subscription Period End**  
Not applicable
- E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets**  
Not applicable
- E.24 Payment Methods for Crypto-Asset Purchase**  
Not applicable
- E.25 Value Transfer Methods for Reimbursement**  
Not applicable
- E.26 Right of Withdrawal**  
Not applicable
- E.27 Transfer of Purchased Crypto-Assets**  
Not applicable
- E.28 Transfer Time Schedule**  
Not applicable
- E.29 Purchaser's Technical Requirements**  
Not applicable
- E.30 Crypto-asset service provider (CASP) name**  
Not applicable
- E.31 CASP identifier**  
Not applicable
- E.32 Placement Form**  
NTAV
- E.33 Trading Platforms name**  
LCX AG
- E.34 Trading Platforms Market Identifier Code (MIC)**  
LCXE

### **E.35 Trading Platforms Access**

NOT is widely traded on multiple regulated and unregulated trading platforms globally. NOT is not restricted to a single exchange and can be accessed by retail and institutional investors worldwide.

LCX Exchange also provides access to NOT trading with the NOT/EUR pair. Investors can access NOT through [LCX.com](https://www.lcx.com), the official LCX exchange, as well as other supported cryptocurrency trading platforms. To trade NOT, users must register, complete KYC (Know Your Customer) verification, and comply with platform-specific requirements.

### **E.36 Involved Costs**

Not applicable

### **E.37 Offer Expenses**

Not applicable

### **E.38 Conflicts of Interest**

Not Applicable

### **E.39 Applicable Law**

For admission to trading of NOT on LCX, the applicable law is Liechtenstein law, applied in accordance with MiCA and EU regulations. For decentralized, on-chain use of NOT outside LCX, applicable law depends on the user's jurisdiction.

### **E.40 Competent Court**

Any disputes related to services provided by LCX fall under the jurisdiction of the Courts of Liechtenstein. For independent on-chain activities with NOT, no centralized legal recourse exists.

## **F. PART F - INFORMATION ABOUT THE CRYPTO-ASSETS**

### **F.1 Crypto-Asset Type**

Other Crypto-Asset

### **F.2 Crypto-Asset Functionality**

NOT functions on The Open Network (TON). Transfers are executed on-chain through TON's Jetton token standard, settled via the Catchain Proof-of-Stake consensus layer.

### **F.3 Planned Application of Functionalities**

Participation rewards, network access, governance. Functionality will be activated progressively through protocol upgrades and network scaling.

### **F.4 Type of white paper**

OTHR

### **F.5 The type of submission**

NEWT

### **F.6 Crypto-Asset Characteristics**

Name & Symbol: Notcoin, NOT.

Blockchain / Technical Base: Built on The Open Network (TON).

Origin / Use Case:

It started as a Telegram mini-game ("tap-to-earn" / clicker) where users earn in-game points by tapping a virtual coin. Later these in-game coins were converted into real NOT tokens.

Supply:

Total/capped supply ~102,456,956,907 NOT

Circulating Supply upon Listing:

The entire supply was unlocked from day one (100%), though not all tokens enter the market/trading immediately.

Mechanics / Features:

Tap-to-earn game mechanics.

Energy system limiting tapping, boosts, leaderboards, social / referral systems.

"Explore" features: users can explore Web3 projects/products and earn NOT.

Distribution Philosophy:

Heavily community-driven / decentralized distribution rather than VC/private sale. A large share allocated to users, especially early participants ("miners", voucher holders, in-game earners).

### **F.7 Commercial name or trading name**

NOT

### **F.8 Website of the issuer**

<https://notcoin.org/>

### **F.9 Starting date of offer to the public or admission to trading**

2025-12-17

### **F.10 Publication date**

2025-12-17

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

Not applicable

**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**

8TKV8L92V

**F.14 Functionally Fungible Group Digital Token Identifier, where available**

False

**F.15 Voluntary data flag**

true

**F.16 Personal data flag**

false

**F.17 LEI eligibility**

false

**F.18 Home Member State**

Liechtenstein

**F.19 Host Member States**

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

## **G. PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS**

### **G.1 Purchaser Rights and Obligations**

What rights do purchasers (holders) of NOT have:

Holders can trade or transfer NOT tokens freely on-chain or on supported exchanges.

There are no mandatory obligations imposed on holders. That means simply holding the token doesn't require specific actions.

Holders can (or could) use the token in the ecosystem: including participating in the game ("tap-to-earn"), possibly in future features like "Explore" where users do tasks in Web3 projects to earn NOT.

What (if anything) are holders obliged to do:

No fixed duties (e.g. no staking requirement, no governance votes, no minimum holding or lock-ups) spelled out.

The obligations are mostly passive: abiding by exchange rules, blockchain gas/transaction fees, etc., inherent to token ownership and usage. (Not specific unique obligations tied only to NOT beyond those general crypto norms.)

### **G.2 Exercise of Rights and Obligation**

To "exercise" the right to transfer or trade NOT, holders simply use standard blockchain transactions or exchanges. There is no special mechanism needed.

If a user wants to withdraw their NOT from the in-game or in-Telegram context to a personal wallet or to exchanges, there are processes (e.g. listing, withdrawal support) that must be followed.

If the project offers future features (for example, tasks/bonuses or in-game benefits), then exercising those may require participating in those tasks, using in-game energy, etc. But those are optional.

### **G.3 Conditions for Modifications of Rights and Obligations**

Whitepaper and Legal Disclosure:

According to the official whitepaper (as published by Kraken and others), the rights and obligations of NOT tokens are those described at the time of issuance. The whitepaper explicitly states that this does not guarantee against future modifications.

Revoked and Fixed Token Rights:

The project has publicly revoked certain rights over the token to ensure permanence and scarcity. This includes:

No further issuance: No new tokens will be minted beyond the existing cap.

Immutable identity: The token's name, logo, or image cannot be changed.

Once revoked, these specific rights cannot be restored, largely locking in the conditions regarding supply, identity, and logo.

Flexible Rights and Future Functionality:

While certain rights (like issuance and identity) are locked, others are more flexible. Features, game mechanics, utility, community incentives, or token utility may evolve. The whitepaper provides no warranty or guarantee for future functionality.

Governance and Project Decisions:

Modifications may be subject to governance or project decisions. However, no public formal Decentralized Autonomous Organization (DAO) structure currently exists to provide token holders with a standardized vote on rights.

Legal and Regulatory Compliance:

Some modifications may be driven by legal or regulatory requirements. Exchanges or jurisdictions might impose restrictions, potentially affecting how holders can exercise rights (e.g., trading, transferring) in certain jurisdictions.

**G.4 Future Public Offers**

Not applicable

**G.5 Issuer Retained Crypto-Assets**

Not applicable

**G.6 Utility Token Classification**

False

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

Not Applicable

**G.8 Utility Tokens Redemption**

Not applicable

**G.9 Non-Trading Request**

True

**G.10 Crypto-Assets Purchase or Sale Modalities**

Not applicable

**G.11 Crypto-Assets Transfer Restrictions**

Not applicable

**G.12 Supply Adjustment Protocols**

Not Applicable- Supply of NOT is fixed, there is no supply adjustment protocol.

**G.13 Supply Adjustment Mechanisms**

Not Applicable

**G.14 Token Value Protection Schemes**

False

**G.15 Token Value Protection Schemes Description**

Not Applicable

**G.16 Compensation Schemes**

False

**G.17 Compensation Schemes Description**

Not Applicable

**G.18 Applicable Law**

For admission to trading of NOT on LCX, the applicable law is Liechtenstein law, applied in accordance with MiCA and EU regulations. For decentralized, on-chain use of NOT outside LCX, applicable law depends on the user's jurisdiction.

**G.19 Competent Court**

Any disputes related to services provided by LCX fall under the jurisdiction of the Courts of Liechtenstein. For independent on-chain activities with NOT, no centralized legal recourse exists.

## **H. PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY**

### **H.1 Distributed ledger technology**

Blockchain: NOT is built on The Open Network (TON) blockchain.

Token Type: NOT is described as a fungible digital token on TON.

Transferability: The tokens are freely transferable to third parties; the usage rights/obligations follow the token upon transfer.

### **H.2 Protocols and Technical Standards**

While there are many technical aspects in the TON chain, specific “standards” for NOT are less deeply documented in public sources. Here’s what is known or reasonably inferred:

Smart Contracts: Since TON supports smart contract functionality, NOT likely adheres to the smart contract framework of TON for issuing, transferring, and managing the token.

Standards: There is no public mention of an ERC-20-type standard (from Ethereum) being used; instead, the token’s behavior is governed according to TON’s native standards. TON has its own standards for fungible tokens (often called “Jettons” in the TON ecosystem) though it’s not explicitly confirmed that NOT uses the Jetton standard.

Compliance Protocols: The white paper for NOT was published “in accordance with Title II of Regulation (EU) 2023/1114 (MiCA)”. So there are regulatory / disclosure protocols followed for EU markets.

### **H.3 Technology Used**

Some of the key technological components, based on TON plus what NOT explicitly/implicitly uses:

Underlying Blockchain – TON

TON is a layer-1 blockchain originally developed by Telegram, now maintained by the TON Foundation.

It supports smart contracts, fast transactions, scalability, etc.

Game Interface / Integration

NOT began in a Telegram mini-game / Telegram based interface, where people tap a virtual coin to earn in-game balances which are later converted to real NOT tokens.

Interactions include tasks, boosts, leaderboards, energy systems.

Token Issuance & Supply Logic

The total supply is fixed (no further issuance beyond the cap).

Token release / airdrops were done to in-game users; conversion from in-game balances to on-chain tokens.

Fee / Transaction Mechanics

Transactions of NOT (transfers) follow TON’s fee structure (gas / compute etc) since it’s on TON. So fees for sending NOT are whatever TON charges for token transfers. (Not specific to NOT beyond standard on TON)

As part of TON, the consensus mechanism is the one used by TON. TON uses a proof-of-stake (PoS) model (with validators, etc).

### **H.4 Consensus Mechanism**

Notcoin employs a Proof of Stake (PoS) mechanism with the Catchain consensus algorithm to secure and scale its multi-chain network. Validators must stake Notcoin to participate in consensus, earning rewards for transaction validation. The protocol is Byzantine Fault Tolerant, ensuring resilience against malicious activity. Regular validator rotation supports decentralization, while

slashing penalizes misconduct. Participants should be aware that staking involves risks, including potential loss of staked assets due to penalties.

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

NOT leverages the established incentive and fee structures of the TON blockchain.

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

True

**H.7 DLT Functionality Description**

The NOT token leverages TON's Jetton fungible token standard on a PoS distributed ledger with sharded scalability. Its core DLT functionality covers issuance (fixed cap), transferability, programmability (via smart contracts), and interoperability with Telegram-based apps, all secured and validated on the decentralized TON blockchain.

**H.8 Audit**

False

**H.9 Audit Outcome**

Not Applicable



## **I. PART I – INFORMATION ON RISKS**

### **I.1 Offer-Related Risks**

Market Volatility: The value of NOT may fluctuate significantly after launch.

Insufficient Demand: The offering may not attract the expected user base or funding.

Limited Liquidity: There is no guarantee of active secondary markets for trading NOT.

### **I.2 Issuer-Related Risks**

Operational Risk: The issuing entity may face financial, legal, or management issues.

Regulatory Risk: Future regulatory changes could impact the issuer's ability to operate.

Dependence on Key Personnel: Loss of core team members may affect the project's progress.

### **I.3 Crypto-Assets-Related Risks**

Price Volatility: Crypto-assets in general are subject to high price fluctuations.

Cybersecurity Threats: Wallets, exchanges, or smart contracts may be vulnerable to attacks.

Lack of Legal Recourse: Users may have limited remedies in the event of token loss or theft.

### **I.4 Project Implementation-Related Risks**

Delays: Project features or milestones may be postponed or fail to launch.

Resource Constraints: Funding shortfalls or technical challenges may affect delivery.

Integration Failure: Planned partnerships or features may not materialize as expected.

### **I.5 Technology-Related Risks**

Smart Contract Bugs: Undiscovered flaws in deployed contracts could cause failures.

Blockchain Dependencies: Reliance on the underlying blockchain (e.g., Solana or other) may introduce external risks like congestion or forks.

System Downtime: Platform outages or infrastructure failure could disrupt service.

### **I.6 Mitigation Measures**

Audits: Smart contracts are subject to independent security audits.

Vesting and Reserves: Controlled token releases reduce the risk of market shocks.

Regulatory Alignment: The project is designed to comply with MiCA and EU laws.

Transparency: Regular updates and on-chain data provide user visibility and trust.

Contingency Planning: A reserve fund and legal structure are in place to handle operational risks.

## J. PART J – INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS

*Adverse impacts on climate and other environment-related adverse impacts.*

### J.1 Information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

The NOT token operates on a user-friendly, scalable blockchain infrastructure, optimized for accessibility and low-cost transactions. The platform's low environmental impact and commitment to sustainable operations align with MiCA's standards for distributed ledger technologies. The network's annual energy consumption is 3.82275 kWh/a.

General information	
<b>S.1 Name</b> <i>Name reported in field A.1</i>	LCX
<b>S.2 Relevant legal entity identifier</b> <i>Identifier referred to in field A.2</i>	529900SN07Z6RTX8R418
<b>S.3 Name of the crypto-asset</b> <i>Name of the crypto-asset, as reported in field D.2</i>	Notcoin
<b>S.4 Consensus Mechanism</b> <i>The consensus mechanism, as reported in field H.4</i>	Combination of Proof of Stakes and Byzantine fault-tolerant over TON network.
<b>S.5 Incentive Mechanisms and Applicable Fees</b> <i>Incentive mechanisms to secure transactions and any fees applicable, as reported in field H.5</i>	Toncoin secures the network through incentives and penalties. Validators earn staking rewards proportional to their stake, plus transaction fees for processing blocks. Frequent validator rotation promotes decentralization, while slashing deters dishonesty by penalizing misconduct. Transaction fees, paid in Toncoin, vary by complexity and demand, ensuring efficiency and fair compensation.
<b>S.6 Beginning of the period to which the disclosure relates</b>	2024-05-18
<b>S.7 End of the period to which the disclosure relates</b>	2024-05-18
Mandatory key indicator on energy consumption	
<b>S.8 Energy consumption</b> <i>Total amount of energy used for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions, expressed per calendar year.</i>	3.82275 kWh per year

Sources and methodologies	
<p><b>S.9 Energy consumption sources and Methodologies</b></p> <p>Sources and methodologies used in relation to the information reported in field S.8</p>	<p>The energy consumption of the NOT token is calculated using a bottom-up approach, focusing on node activity. Public data, open-source tools, and certified lab tests inform estimates. Network-level energy use is attributed to the token based on its gas usage, using FFG DTI data to identify asset implementations.</p>

**J.2 Supplementary information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism**

Not Applicable