

# MiCA White Paper

## Sui (SUI)

Version 1.1  
August 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).

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**01 DATE OF NOTIFICATION**

2025-09-01

**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

The SUI token is the native digital asset of the Sui blockchain, classified under MiCA as an “Other Crypto-Asset.” It was created and is maintained by the Sui Foundation, a non-profit entity established to support the development and decentralization of the Sui ecosystem.

SUI operates on the Sui blockchain, a purpose-built Layer 1 network that uses the Move programming language and a Delegated Proof-of-Stake (DPoS) consensus mechanism. Within this system, SUI serves multiple essential functions. It is required for the payment of transaction (gas) fees on the network, it may be delegated to validators to secure the consensus mechanism while earning staking rewards, and it grants holders the ability to participate in on-chain governance proposals. In addition, SUI functions as a medium of exchange within the Sui ecosystem, granting access to decentralized applications and services built on the network.

The total supply of SUI was fixed at 10 billion tokens at genesis. These tokens are distributed among community programs, ecosystem contributors, early investors, and the Foundation treasury. Tokens are fungible and freely transferable across exchanges and wallets that support the Sui network.

Unlike asset-referenced or e-money tokens, SUI does not include a stabilization mechanism, nor is it pegged to an underlying asset or currency. Its value is determined solely by market supply and demand. Furthermore, SUI does not grant redemption rights at par value or any claim against the issuer’s assets.

### 09 Not applicable

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

Here are the key information about the SUI (Sui):

|   |                |
|---|----------------|
| <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 Depository – 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**

Sui Foundation

**B.3 Legal Form**

Independent Foundation (non-profit structure implied)

**B.4 Registered Address**

Lewes, Delaware, USA

**B.5 Head Office**

Unknown

**B.6 Registration Date**

Sui Foundation (Cayman Islands) – founded 2022

**B.7 Legal Entity Identifier**

Not applicable

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

Not applicable

**B.9 Parent Company**

Sui Foundation does not have a parent company.

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

- Evan Cheng : CEO
- Gabriel Feinberg : Head of Legal & Compliance Team
- Oliver Barker : Funding Program Manager

**B.11 Business Activity**

The Sui Foundation is focused on the development, support, and decentralization of the Sui blockchain, a high-performance Layer 1 network. Its core activities include funding ecosystem projects, promoting adoption of the SUI token, providing grants to developers and researchers, supporting education and community initiatives, and overseeing governance-related matters.

**B.12 Parent Company Business Activity**

The Sui Foundation does not have a parent company. It is an independent, non-profit organization established to support the Sui ecosystem.

**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 voluntarily preparing this MiCA-compliant whitepaper for SUI to enhance transparency, regulatory clarity, and investor confidence. LCX is providing this document to support its role as a Crypto-Asset Service Provider (CASP) and ensure compliance with MiCA regulations in facilitating SUI 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 Depository – 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**

Sui

**D.2 Crypto-Assets Name**

SUI

**D.3 Abbreviation**

SUI

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

SUI is the native token of the Sui blockchain, a high-performance, horizontally scalable Layer 1 platform designed for instant settlement, rich on-chain assets, and composable smart contracts. Developed by Mysten Labs and supported by the Sui Foundation, the network utilizes the Move programming language, which enhances security and performance for smart contract development.

The core objective of the Sui project is to support the next generation of decentralized applications, particularly those requiring low-latency and high throughput — such as games, DeFi protocols, NFTs, and real-time user-owned digital experiences.

The SUI token plays a central role in maintaining and operating the Sui blockchain ecosystem. It is used to pay for computation and storage on the network, incentivize validators and delegators, and grant holders the ability to influence network governance. This structure ensures that network participants are aligned and incentivized to maintain the security and efficiency of the platform.

The Sui project emphasizes scalability, security, and developer accessibility, aiming to provide a robust infrastructure for Web3 innovation. Its unique object-centric data model and parallel execution engine distinguish it from other blockchains, enabling unprecedented levels of transaction throughput without compromising decentralization.

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

Here the details of the person involved in SUI Crypto Project Implementation:

| Full Name             | Business Address      | Function   |
|-----------------------|-----------------------|--|
| Evan Cheng            | <i>Not Applicable</i> | <i>CEO</i>                                       |
| Gabriel Feinberg      | <i>Not Applicable</i> | <i>Head of Legal &amp; Compliance Team</i>       |
| <i>Oliver Barker</i>  | <i>Not Applicable</i> | <i>Funding Program Manager</i>                   |
| <i>Sui Foundation</i> | <i>Cayman Islands</i> | <i>Advancement, adoption of the Sui network.</i> |

**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**

Not Applicable

## **D.9 Resource Allocation**

The total supply of 10 billion SUI tokens was allocated at genesis across multiple categories:

- *Community Access Program & App Testers* – portion reserved for early users and participants.
- *Community Reserve* – tokens controlled by the Sui Foundation to fund ecosystem growth, developer grants, delegation programs, and community incentives.
- *Investors & Early Contributors* – tokens allocated to private backers, team, and Mysten Labs (subject to vesting).
- *Treasury & Strategic Reserves* – held by the Foundation for long-term ecosystem sustainability.

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

Funds raised through private sales and the April 2023 public sales are directed to:

- *Ecosystem Development* – grants, accelerator programs, hackathons, and funding for developers building on Sui.
- *Research & Development* – continuous upgrades to Sui's Layer-1 blockchain and tooling, led by Mysten Labs and supported by the Sui Foundation.
- *Community Programs* – staking delegation, ambassador initiatives, and educational outreach.
- *Operational Expenses* – foundation management, legal and compliance costs, and partnerships.
- *Liquidity Support* – ensuring healthy trading and availability of SUI tokens across exchanges.

## **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 voluntarily filing a MiCA-compliant whitepaper for SUI to enhance transparency, regulatory clarity, and investor confidence. By doing so, LCX strengthens its position as a regulated exchange, ensuring a trustworthy and transparent trading environment for SUI 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 SUI in a compliant manner. It further supports the broader market adoption and integration of SUI 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**

The total supply of 10,000,000,000 (10 billion) SUI tokens was created at genesis. At the time of the April 2023 community access sale, approximately 528 million SUI were offered to the public via exchange launchpads.

The number of currently circulating / traded tokens is lower than the total supply, due to vesting schedules and foundation reserves. Circulating supply continues to increase gradually as locked tokens are released.

### **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**

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

LCX Exchange also provides access to SUI trading with the SUI/EUR pair. Investors can access SUI through [LCX.com](https://www.lcx.com), the official LCX exchange, as well as other supported cryptocurrency trading platforms. To trade SUI, 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**

The SUI Token complies with MiCA regulations in the EU and relevant AML, CTF, and investor protection laws. It is not classified as e-money or a financial instrument. Regulatory and tax obligations vary by jurisdiction, and users should review local laws before trading.

**E.40 Competent Court**

In case of disputes related to services provided by LCX, the competent court is: The Courts of Liechtenstein, with jurisdiction in accordance with Liechtenstein law and applicable EU regulations.

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

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

Other Crypto-Asset

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

The SUI token is the native asset of the Sui Layer-1 blockchain and serves multiple core functions. It is primarily used to pay gas fees for transactions and smart contract execution, ensuring smooth network operations. SUI also underpins the network's Delegated Proof-of-Stake (DPoS) consensus, where holders can stake or delegate their tokens to validators and earn rewards while contributing to network security. Beyond this, SUI enables governance participation, allowing holders to influence ecosystem decisions and protocol development. The token further supports a storage fund mechanism that compensates validators for long-term data storage, promoting economic sustainability. Additionally, it acts as a medium of exchange within the ecosystem—facilitating payments, transfers, and access to decentralized applications—while also funding community programs, grants, and developer incentives through the Sui Foundation. In this way, SUI combines utility<sup>1</sup>, governance, and incentive functions, making it essential to both the operation and growth of the Sui network.

### **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**

The SUI token is classified under MiCA as an *Other Crypto-Asset*. It is issued and recorded on the Sui blockchain, a purpose-built Layer 1 network. SUI tokens are fully transferable between all compatible wallets and can be divided into units of up to eighteen decimal places, ensuring usability for both small and large transactions.

The token supply was fixed at 10 billion units at genesis and no further minting is possible beyond this predetermined cap. Holding SUI does not provide ownership in any legal entity, voting rights in corporate governance structures, or entitlement to dividends or profit-sharing. Its value is determined exclusively by supply and demand in the market.

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

SUI

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

<https://sui.io/>

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

2025-10-01

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

2025-10-01

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<sup>1</sup> While SUI provides utility within the ecosystem, it does not constitute a Utility Token under Article 3(1)(8) of MiCA, as its access rights are not contractually guaranteed nor tied to specific, identifiable goods or services.

- 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**  
64RFW3D8P
- F.14 Functionally Fungible Group Digital Token Identifier, where available**  
90KLX8GQX
- 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**

SUI tokens are utility<sup>2</sup> tokens that provide holders with access to certain features and services within the Sui blockchain ecosystem. By acquiring and holding SUI tokens, purchasers agree to the following rights and obligations:

Rights:

Access to participate in on-chain governance mechanisms (where applicable).

Use of SUI tokens for payment of transaction fees, staking, and interactions with decentralized applications (dApps) built on the Sui blockchain.

Non-exclusive access to blockchain-based services and functionalities, as outlined in the Sui ecosystem documentation.

The ability to freely transfer SUI tokens to other participants, subject to applicable legal and regulatory restrictions.

Obligations:

Compliance with the Sui blockchain's terms of use and technical specifications.

Responsibility to secure their private keys and digital wallets.

Use of the SUI tokens in a lawful manner, consistent with applicable laws and regulations in the user's jurisdiction.

SUI tokens do not confer any ownership, profit-sharing rights, debt claims, or entitlement to dividends or revenues generated by the issuer or any third party.

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

SUI token holders may exercise their rights through the following means:

**Staking & Delegation:** Token holders can stake SUI with validators to participate in consensus and may receive staking rewards. The process is managed via the Sui blockchain's staking interface or supported third-party wallets.

**Fee Payments:** SUI tokens are used to pay for gas fees for transactions executed on the Sui network.

**Governance Participation (if applicable):** Holders may vote on protocol improvement proposals using their tokens through the governance portal (if implemented).

**Transferability:** Tokens are fully transferable and may be sent to other addresses on the Sui blockchain using standard transaction functionality.

**Access to Services:** Certain dApps or smart contracts may require SUI tokens to unlock features or perform operations.

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

The rights and obligations associated with SUI tokens may be subject to change under specific conditions. The following principles apply:

Any modifications must be approved through a transparent governance process involving token holder voting (if governance is activated).

Changes may include adjustments to staking rewards, governance rights, or usage within the ecosystem. However, they shall not retroactively apply to transactions or actions executed before the effective date of the change.

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<sup>2</sup> While SUI provides utility within the ecosystem, it does not constitute a Utility Token under Article 3(1)(8) of MiCA, as its access rights are not contractually guaranteed nor tied to specific, identifiable goods or services.

The issuer or governance body will notify holders at least 30 calendar days in advance before implementing material changes.

Notifications will be published via the official Sui website, governance portal, and/or relevant community channels.

If governance is not implemented, rights and obligations may be amended by the issuer in response to regulatory changes or technical upgrades, with prior notice to holders.

**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**

The SUI token follows a protocol-defined issuance schedule. The total supply was set at genesis (e.g., 10 billion SUI), with additional tokens released through staking rewards. The protocol does not include automated burning or dynamic adjustments based on market demand.

All future changes to supply parameters must be approved through on-chain governance, ensuring transparency and immutability.

**G.13 Supply Adjustment Mechanisms**

SUI supply expands via:

Validator staking rewards, following a pre-defined inflation curve;

Ecosystem allocations based on governance-approved programs;

Vesting schedules which gradually release locked tokens.

There is no algorithmic supply adjustment or real-time mint/burn based on price.

**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**

The SUI Token complies with MiCA regulations in the EU and relevant AML, CTF, and investor protection laws. It is not classified as e-money or a financial instrument. Regulatory and tax obligations vary by jurisdiction, and users should review local laws before trading.

**G.19 Competent Court**

In case of disputes related to services provided by LCX, the competent court is: The Courts of Liechtenstein, with jurisdiction in accordance with Liechtenstein law and applicable EU regulations.

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

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

SUI operates on the Sui blockchain, a Layer-1 distributed ledger built for scalability and low-latency transaction processing. It uses object-centric data storage to manage assets natively on-chain.

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

The network relies on Delegated Proof-of-Stake (DPoS) for validator selection and staking. For consensus, it integrates Narwhal (mempool/data availability layer) and Bullshark (Byzantine fault-tolerant consensus engine). Smart contracts are written in Move, a resource-oriented programming language originally developed at Meta.

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

Key components include:

- Move language & runtime for smart contracts and asset management.
- Narwhal & Bullshark protocols for secure and efficient consensus.
- Byzantine Consistent Broadcast (BCB) for fast finality of simple transactions.
- Delegated staking system for validator participation and token holder delegation.

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

The Sui blockchain uses a Delegated Proof-of-Stake (DPoS) consensus mechanism, optimized for high throughput and low latency. Its design separates simple transactions from complex transactions, making the system more efficient.

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

The SUI token ensures security and economic alignment through staking, delegation, and fees. Validators stake SUI to secure the network and earn rewards, while malicious behavior is deterred through slashing. Token holders can delegate SUI to validators and share in rewards, fostering broad participation. Users pay transaction fees in SUI for network operations, with a dynamic fee model that adjusts based on demand and transaction complexity. This system balances efficiency, security, and sustainability in line with MiCA requirements.

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

True

### **H.7 DLT Functionality Description**

The Sui blockchain supports transaction execution, staking, delegation, governance, and on-chain storage. Its design separates simple transactions (processed without consensus) from complex ones (ordered via Narwhal/Bullshark), enabling high throughput and sub-second finality. Users pay fees in SUI, which dynamically adjust based on demand, ensuring sustainable operation.

### **H.8 Audit**

True

### **H.9 Audit Outcome**

The Sui blockchain has undergone multiple independent security audits by firms such as Halborn and Zelic, covering its Layer-1 protocol, Move language modules, SDKs, and tooling. Critical issues were remediated before release, with audit reports published publicly on GitHub and the Sui website, reflecting strong transparency. While no unresolved core vulnerabilities have been reported, a \$200M exploit on the Cetus AMM (May 2025) highlighted risks in third-party DeFi applications built on Sui, not in the core protocol itself.

Overall, SUI demonstrates a proactive, transparent, and continuous approach to security. Here is the link to the audit report:

[https://github.com/sui-foundation/security-audits/blob/main/docs/Sui\\_Core\\_L1\\_Halborn\\_Final.pdf](https://github.com/sui-foundation/security-audits/blob/main/docs/Sui_Core_L1_Halborn_Final.pdf)

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

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

Market Volatility: The value of SUI 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 SUI.

### **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 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 SUI token powers a scalable and user-friendly blockchain designed for fast, low-cost transactions. Its efficient consensus mechanism ensures low environmental impact, while its sustainable design aligns with MiCA's standards for distributed ledger technologies. The network's annual energy consumption is 384739.20000 kWh/a.

| <b>General information</b>  |   |
|---|---|
| <b>S.1 Name</b><br><i>Name reported in field A.1</i>  | LCX   |
| <b>S.2 Relevant legal entity identifier</b><br>Identifier referred to in field A.2  | 529900SN07Z6RTX8R418  |
| <b>S.3 Name of the crypto-asset</b><br>Name of the crypto-asset, as reported in field D.2   | SUI   |
| <b>S.4 Consensus Mechanism</b><br>The consensus mechanism, as reported in field H.4   | Byzantine Fault Tolerant (BFT)  |
| <b>S.5 Incentive Mechanisms and Applicable Fees</b><br>Incentive mechanisms to secure transactions and any fees applicable, as reported in field H.5  | Validators stake SUI to secure the network, earning rewards while risking slashing for misconduct. Token holders may delegate SUI to validators, sharing rewards. Users pay transaction fees in SUI, funding validators and ensuring efficient, secure blockchain operations. |
| <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  |
| <b>Mandatory key indicator on energy consumption</b>  |   |
| <b>S.8 Energy consumption</b><br>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 | 384739.20000 kWh per year   |
| <b>Sources and methodologies</b>  |   |
| <b>S.9 Energy consumption sources and Methodologies</b>   | The energy consumption of the SUI 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  |

|   |   |
|---|---|
| Sources and methodologies used in relation to the information reported in field S.8 | attributed to the token based on its gas usage, using FFG DTI data to identify asset implementations. |
|---|---|

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

| <b>Supplementary key indicators on energy and GHG emissions</b>  |  |
|--|--|
| <p><b>S.10 Renewable energy consumption</b></p> <p>Share of energy used generated from renewable sources, expressed as a percentage of the total amount of energy used per calendar year, for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions.</p> | 32.225548601%  |
| <p><b>S.11 Energy intensity</b></p> <p>Average amount of energy used per validated transaction</p>   | 0.00001 kWh  |
| <p><b>S.12 Scope 1 DLT GHG emissions – Controlled</b></p> <p>Scope 1 GHG emissions per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions</p>   | 0.00000 tCO <sub>2</sub> e per year  |
| <p><b>S.13 Scope 2 DLT GHG emissions – Purchased</b></p> <p>Scope 2 GHG emissions, expressed in tCO<sub>2</sub>e per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions</p>   | 128.04623 tCO <sub>2</sub> e/a   |
| <p><b>S.14 GHG intensity</b></p> <p>Average GHG emissions (scope 1 and scope 2) per validated transaction</p>  | 0.00000 kgCO <sub>2</sub> e per transaction  |
| <b>Sources and methodologies</b>   |  |
| <p><b>S.15 Key energy sources and methodologies</b></p> <p>Sources and methodologies used in relation to the information reported in fields S.10 and S.11</p>  | <p>To determine the proportion of renewable energy usage, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from the European Environment Agency (EEA) and thus determined.</p> |

|  |   |
|--|---|
| <p><b>S.16 Key GHG sources and methodologies</b></p> <p>Sources and methodologies used in relation to the information reported in fields S.12, S.13 and S.14</p> | <p>To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from the European Environment Agency (EEA) and thus determined.</p> |
|--|---|