This white paper has been prepared in compliance with the requirements of the Commission Implementing Regulation 2024/2984 of 29 November 2024 implementing technical standards for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to forms, formats and templates for the crypto-asset White Paper

Neiro (First Neiro On Ethereum) (NEIRO) Token White Paper

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.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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01	Date of notification	[2025–[XX]–[XX]]	YYYY-MM-DD
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	Regarding offerors: 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	Predefined alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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 of the European Parliament and of the Council 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.	Predefined alphanumerical text
04	Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.	Predefined alphanumerical text
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	true The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.	'true' – Yes 'false' – Not applicable If Yes, Predefined alphanumerical text
06	Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.	Predefined alphanumerical text
SUMMARY			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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 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 or any other offer document pursuant to Union or national law.	Predefined alphanumerical text
08	Characteristics of the crypto-asset	The Neiro token is a utility token as defined by Article 3(1)(9) of Regulation (EU) 2023/1114 of the European Parliament and Council of 31 May 2023 on markets in crypto-assets (“**MiCA**”). The Neiro token operates within the Neiro network, primarily designed to enable decentralised services and network governance. The token facilitates transaction validation and empowers users to engage in the governance of the Neiro ecosystem. The Neiro token is not intended for investment purposes and does not grant holders any rights to dividends, revenue shares, or profits. It does not represent any financial claim on the	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		network or provide any claims to financial returns outside of the use of the Neiro network's services. Moreover, Neiro does not confer voting rights beyond the governance mechanisms specific to the Neiro blockchain. As a utility token, Neiro functions within a decentralised ecosystem, with holders maintaining full control over their assets via non-custodial wallets. Transactions within the Neiro network are processed under the Ethereum Proof of Stake (PoS) consensus mechanism, ensuring security, efficiency, and decentralisation. The Neiro network is a blockchain-based platform built to enhance scalability, providing decentralised and permissionless services while offering users efficient, low-cost, and scalable solutions.	
09		Not applicable.	Free alphanumerical text
10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/first-neiro-on-ethereum/ The Neiro token was officially launched on the Ethereum blockchain, a network renowned for its decentralised computing capabilities and scalability solutions for blockchain applications. Initially deployed on Ethereum, Neiro has expanded its operations to ensure compatibility across various blockchain ecosystems. The token leverages the ERC-20 token standard to ensure cross-chain interoperability and extend its presence across decentralised and centralised platforms. As of April 3, 2025, the Neiro token has a market capitalisation of approximately $72.78	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		million USD, with a 24-hour trading volume of $75.69 million USD. The circulating supply stands at 420.68 billion Neiro coins, with a total supply of 420.69 billion Neiro coins. The total supply of Neiro has been capped at 420.69 billion tokens, a limit confirmed in the Neiro whitepaper.	
Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Neiro is a community-driven token	Free alphanumerical text
A.2	Legal form	Information not publicly available as Neiro is a community-driven token	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
A.3	Registered address	The specific registered address of the Neiro project is not publicly disclosed. The project is developed and operated by a decentralised team.	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.4	Head office	The project is developed and operated by a decentralised team and therefore does not have a head office.	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.5	Registration date	Not applicable	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Not applicable	{LEI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.7	Another identifier required pursuant to applicable national law	Not applicable	Free text
A.8	Contact telephone number	Information not publicly available	Free alphanumerical text
A.9	E-mail address	contact@neiro.ai	Free alphanumerical text
A.10	Response time (Days)	Information not publicly available	{DURATION}
A.11	Parent company	Not applicable	Free alphanumerical text
A.12	Members of the management body	Not publicly available information as the developers are anonymous.	Free alphanumerical text presented in a tabular format
A.13	Business activity	Not publicly available information as the developers are anonymous.	Free alphanumerical text
A.14	Parent company business activity	Not applicable	Free alphanumerical text
A.15	Newly established	false	‘true’ – Yes ‘false’ – No

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.16	Financial condition for the past three years	[Not applicable] Where the offeror or person seeking admission to trading has been established for the past three years, the financial condition of the offeror or person seeking admission to trading over the past three years. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is required, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	Free alphanumerical text
A.17	Financial condition since registration	[Not applicable] Where the offeror or person seeking admission to trading has not been established for the past three years, description of its financial condition since the date of its registration. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is available, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading			
Not applicable			
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	Revolut Digital Assets Europe Ltd	Free alphanumerical text
C.2	Legal form	Legal entity	ISO standard 20275 ‘Financial Services – Entity Legal Forms (ELF)’
C.3	Registered address	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
C.4	Head office	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.5	Registration date	2022-08-09	ISO 8601 date format (YYYY-MM-DD)
C.6	Legal entity identifier	549300ET4IUR6RCZOL84	{LEI}
C.7	Another identifier required pursuant to applicable national law	Company registration number: HE430310	Free text
C.8	Parent company	Revolut Group Holdings Ltd	Free alphanumerical text
C.9	Reason for crypto-asset white paper Preparation	This crypto-asset white paper has been drawn up in accordance with the requirements of Article 4, Article 6 and Article 8 of Regulation (EU) 2023/1114.	Free alphanumerical text
C.10	Members of the Management body	Mr Costas Michael (CEO) Mr Christos Drakos (CFO) Mr Ioannis Ashiotis (NED) Mr Konstantinos Adamos (NED)	Free alphanumerical text presented in a tabular format
C.11	Operator business activity	Revolut Digital Assets Europe Ltd is a financial technology company registered as a crypto-assets services provider by the Cyprus Securities and Exchange Commission. Revolut Digital Assets Europe Ltd provides crypto-asset services across the European Union, including buying, selling, and exchange of crypto-assets.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Revolut Digital Assets Europe Ltd has applied to the Cyprus Securities and Exchange Commission for a crypto-asset services provider (CASP) authorisation under Regulation (EU) 2023/1114. The authorisation is expected to cover the following crypto-asset services: ● exchange of crypto-assets for funds ● exchange of crypto-assets for crypto-assets ● operation of a Trading Platform ● custody and administration of crypto-assets ● transfer of crypto-assets	
C.12	Parent company business activity	Revolut Digital Assets Europe Ltd is a wholly-owned subsidiary of Revolut Group Holdings Ltd, a private company limited by shares registered in England and Wales (company number: 12743269)	Free alphanumerical text
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
Part D- Information about the crypto-asset project			
D.1	Crypto-asset project name	Neiro	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
D.2	Crypto-assets name	See DTI in F.13	Free alphanumerical text
D.3	Abbreviation	See DTI in F.13	Free alphanumerical text
D.4	Crypto-asset project description	The Neiro token (Neiro) is a community-driven cryptocurrency inspired by Kabosu, the Shiba Inu behind the iconic Dogecoin meme. Following Kabosu's passing in May 2024, her owner, Atsuko Sato, adopted a new Shiba Inu named Neiro, sparking the creation of the Neiro token. **Key Features of Neiro:** ● **Blockchain Deployment:** Launched on the Ethereum blockchain on July 27, 2024, Neiro emphasises decentralisation and community governance. ● **Tokenomics:** Neiro has a total supply of approximately 420.69 billion tokens, with nearly all in circulation. Notably, there are no transaction taxes, and the development team does not hold any tokens, promoting transparency and community ownership. ● **Community Engagement:** The project thrives on community support, with active participation in charitable initiatives, including donations to animal welfare organisations.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Considerations: As with other memecoins, Neiro's value is highly volatile and influenced by market sentiment and social media trends. Potential investors should exercise caution and conduct thorough research before engaging with the token.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Not publicly available.	Free alphanumerical text presented in a tabular format
D.6	Utility Token Classification	true	‘true’ – Yes ‘false’ – No
D.7	Key Features of Goods/Services for Utility Token Projects	The Neiro token (Neiro), inspired by Kabosu—the Shiba Inu behind the Dogecoin meme—is primarily utilised within its community-driven ecosystem for various purposes: **Primary Uses of Neiro:** ● Peer-to-Peer Transactions: Neiro facilitates direct transactions among users, enabling quick and cost-effective transfers without transaction fees. ● Tipping and Donations: The token is commonly used for tipping content creators and donating to charitable causes, particularly those supporting animal welfare. ● Staking and Rewards: Neiro offers staking opportunities where participants can lock their tokens to support network operations and receive rewards, such	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		as additional Neiro tokens or exclusive digital assets. ● Governance Participation: Holders of Neiro tokens have the right to participate in governance decisions, influencing the project's development and strategic direction.	
D.8	Plans for the token	The Neiro a community-driven cryptocurrency inspired by Neiro, the Shiba Inu adopted by Atsuko Sato following the passing of Kabosu, the original Dogecoin mascot. As a memecoin, Neiro's primary focus is community engagement and entertainment rather than providing traditional financial utilities. **Current and Future Plans for Neiro:** ● Exchange Listings: Neiro has been listed on several cryptocurrency exchanges, including LBank and BingX, enhancing its accessibility for trading and investment. ● Community Engagement: The project emphasises community involvement, with plans for events and initiatives to strengthen its user base and increase token adoption. ● Charitable Activities: In honour of its Shiba Inu inspiration, Neiro is involved in charitable activities, including donations to animal welfare organisations. **Considerations:** As a memecoin, Neiro's value is highly volatile and influenced by market sentiment and social media trends. Potential investors should	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		exercise caution and conduct thorough research before engaging with the token.	
D.9	Resource allocation	Offering initially made 2024-07-27 with 420,680,000,000 in circulation as of 2025-04-03.	Free alphanumerical text
D.10	Planned use of collected funds or crypto-assets	The Neiro token is a community-driven cryptocurrency inspired by Kabosu, the Shiba Inu behind Dogecoin. Beyond its role as a memecoin, Neiro integrates charitable initiatives into its ecosystem. **Planned Uses of Collected Funds:** ● Charitable Contributions: A portion of transaction fees is allocated to the Neiro Foundation, supporting global causes, particularly Shiba Inu rescue and welfare efforts. ● Platform Development: Funds are directed towards enhancing the Neiro platform's infrastructure, ensuring scalability, security, and user-friendly experiences. ● Marketing and Community Engagement: Investments in marketing strategies aim to expand Neiro's reach, attract new users, and foster a vibrant, engaged community. ● Strategic Partnerships: Resources are allocated to establish collaborations that enhance Neiro's utility and adoption within the broader cryptocurrency ecosystem. **Recent Initiatives:** ● Gains Network Collaboration: In September 2024, Gains Network pledged a 15% revenue share from	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Neiro/USD trading volumes on gTrade to the Neiro Foundation, ensuring sustainable funding for charitable activities.	
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	‘OTPC’ - offer to the public ‘ATTR’ - admission to trading
E.2	Reasons for public offer or admission to trading	The Neiro token was introduced primarily to foster community engagement and capitalise on the popularity of meme coins. Inspired by Kabosu, the Shiba Inu behind Dogecoin, Neiro serves several purposes: ● **Community Engagement:** Neiro aims to unite enthusiasts in a decentralised environment, allowing holders to influence the project's direction through governance mechanisms. ● **Charitable Contributions:** The project emphasises philanthropy, with the Neiro Foundation supporting animal welfare initiatives, reflecting the community's commitment to charitable causes. ● **Trading and Liquidity:** Listing Neiro on various exchanges enhances its liquidity, enabling users to trade the token for other cryptocurrencies or fiat currencies, thus increasing its accessibility and utility within the broader cryptocurrency market. These objectives align with the broader trend of meme coins, which often combine community-driven development with charitable	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		endeavors and trading opportunities.	
E.3	Fundraising target	0	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.4	Minimum subscription goals	0	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.5	Maximum subscription goals	0	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.6	Oversubscription acceptance	false	‘true’- Yes ‘false’ – No
E.7	Oversubscription allocation	Not applicable	Free alphanumerical text
E.8	Issue price	0.13	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	USD	{CURRENCYCODE_3} or {DTI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.10	Subscription fee	Not applicable	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	Decentralised exchange liquidity pool pricing	Free alphanumerical text
E.12	Total number of offered/traded crypto-assets	420,690,000,000 of the total fixed number of 420,680,000,000 in circulation as of 2025-04-04.	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	'RETL' – retail investors 'PROF' – professional investors 'ALL' – all types of investors
E.14	Holder restrictions	There are currently no formal restrictions on who may hold or trade Neiro tokens enforced by the Neiro token contract or community. However, access may be restricted by exchange platforms or national laws.	Free alphanumerical text
E.15	Reimbursement notice	Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114.	Predefined alphanumerical text
E.16	Refund mechanism	Not applicable	Free alphanumerical text
E.17	Refund timeline	Not applicable	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.18	Offer phases	Not applicable	Free alphanumerical text
E.19	Early purchase discount	Not applicable	Free alphanumerical text
E.20	Time-limited offer	false	‘true’- Yes ‘false’ – No
E.21	Subscription period beginning	2024-08-04	ISO 8601 date format (YYYY-MM-DD)
E.22	Subscription period end	2024-08-05	ISO 8601 date format (YYYY-MM-DD)
E.23	Safeguarding arrangements for offered funds/crypto- Assets	The Neiro token operates as part of the Neiro network, a decentralised, community-driven blockchain project. As such, it does not rely on centralised custodians or traditional safeguarding mechanisms typically associated with regulated financial products. The safeguarding of Neiro tokens primarily relies on the inherent security features of the Ethereum blockchain and the standard practices of decentralised finance (DeFi). **Safeguarding Measures Include:** **Blockchain-Level Security** Transactions and token balances are secured through public-key cryptography and the Proof of Stake (PoS) consensus mechanism on Ethereum, ensuring network integrity and resistance to fraudulent activities. **Self-Custody** Neiro token holders retain full control of their assets within self-custodied	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Ethereum-compatible wallets, with no reliance on third-party custodians. Users are responsible for their private keys and wallet security. **Platform-Specific Security** When Neiro tokens are traded on decentralised or centralised exchanges, additional safeguarding is provided by platform-specific security measures such as two-factor authentication (2FA), AML/KYC compliance, and other security protocols applied by the respective exchange operators. **Smart Contract Transparency** The original Neiro smart contract operates transparently on the Ethereum blockchain, with full visibility and scrutiny by the blockchain community. As Neiro is decentralised, there is no unilateral control by the creators, ensuring that governance and control are distributed across the community.	
E.24	Payment methods for crypto-asset purchase	The Neiro token can be purchased through various payment methods, depending on the exchange platform where the token is listed: **Cryptocurrency-to-Cryptocurrency (Crypto-to-Crypto)** The primary method for purchasing Neiro tokens is via crypto-to-crypto trades on both decentralised and centralised exchanges. Neiro is commonly paired with Ethereum (ETH) and USD Tether (USDT). Purchases can be made on decentralised exchanges, as well as centralised exchanges. **Stablecoins** Many exchanges allow users to trade stablecoins for Neiro tokens. These stablecoins, generally pegged to fiat	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		currencies, provide a more stable pricing mechanism for acquiring Neiro. **Fiat-to-Crypto Purchases (via Centralised Exchanges)** On centralised exchanges that support fiat-to-crypto trading, users can purchase widely used cryptocurrencies directly using fiat currencies (e.g., GBP, EUR, USD) and then trade them for Neiro. **Peer-to-Peer (P2P)** Neiro tokens can also be acquired through peer-to-peer transactions by directly arranging transfers with other token holders or using peer-to-peer platforms that support ERC-20 tokens.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	Not applicable	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	Neiro token holders can freely transfer Neiro tokens after purchase, subject to the technical rules of the Ethereum blockchain and the policies of the platforms they use. There are no protocol-imposed restrictions within the Neiro smart contract regarding the transferability of tokens. However, exchanges or applicable legal frameworks may impose limitations depending on the holder's jurisdiction or compliance obligations, such as AML or KYC requirements. ● The transfer process follows standard practices for ERC-20 tokens. After purchasing Neiro tokens on a decentralised or centralised exchange,	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		tokens can be transferred to personal non-custodial wallets or directly to other users via wallet-to-wallet transactions using Ethereum-compatible wallets or hardware wallets. ● Tokens acquired on centralised exchanges can be withdrawn to external wallets, provided the exchange supports Neiro withdrawals. The withdrawal process may be subject to the exchange's policies, including fees, minimum withdrawal thresholds, and verification requirements. ● Neiro tokens can also be used within DeFi applications and the broader Neiro network, for purposes such as liquidity provision, trading, or participation in future applications within the Neiro ecosystem.	
E.28	Transfer time schedule	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To acquire, store, and interact with Neiro tokens, purchasers must meet certain technical requirements that ensure compatibility with the Ethereum blockchain and the ERC-20 token standard. **Digital Wallet** Purchasers must use a digital wallet compatible with ERC-20 tokens. Commonly used wallets hardware wallet, and other Ethereum-compatible wallets. These wallets enable interaction with the Ethereum blockchain, facilitate transfers, storage, and participation in decentralised applications	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		(dApps) where Neiro is available. **ETH for Gas Fees** In addition to holding Neiro tokens, users must maintain a sufficient balance of ETH in their wallets to cover gas fees. These fees are required for processing transactions, including sending Neiro tokens, interacting with DeFi platforms, and performing other on-chain activities on the Ethereum network. Gas fees vary depending on the network congestion and are paid in ETH. **Centralised Exchange Account** For those purchasing Neiro tokens on centralised exchanges, an exchange account is required. These platforms may require account verification and completion of KYC procedures, depending on jurisdiction and applicable regulations. Once Neiro tokens are acquired on a centralised exchange, they can be withdrawn to an external Ethereum-compatible wallet for personal custody and further use within the Neiro network.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd	Free alphanumerical text
E.31	CASP identifier	549300ET4IUR6RCZOL84	{LEI}
E.32	Placement form	WOUT	‘WITH- with a firm commitment basis ‘WOUT’ - without a firm commitment basis ‘NTAV’ - Not applicable

<table>
<tr><th>No</th><th>FIELD</th><th>CONTENT TO BE REPORTED</th><th>FORM AND STANDARDS TO BE USED FOR REPORTING</th></tr>
<tr><td>E.33</td><td>Trading platforms name</td><td>Revolut Digital Assets Europe Ltd</td><td>Free alphanumerical text</td></tr>
<tr><td>E.34</td><td>Trading platforms
Market identifier code (MIC)</td><td>Not applicable</td><td>{MIC}</td></tr>
<tr><td>E.35</td><td>Trading platforms access</td><td>CEXs
DEXs</td><td>Free alphanumerical text</td></tr>
<tr><td>E.36</td><td>Involved costs</td><td><table>
<tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr>
<tr><td>Centralised Exchange (CEX)</td><td>Trading Fee</td><td>0.1%–0.4% per trade</td></tr>
<tr><td></td><td>Withdrawal Fee</td><td>~0.01-0.05 SOL or platform-specifi</td></tr>
<tr><td>Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>~0.25-0.3%</td></tr>
<tr><td></td><td>Gas Fee (SOL)</td><td><$0.001 per trade</td></tr>
<tr><td>Fiat On-Ramp</td><td>Service/Processing</td><td>3%–5%</td></tr>
</table></td><td>Free alphanumerical text</td></tr>
<tr><td>E.37</td><td>Offer expenses</td><td>Neiro did not incur formal offer expenses, as there was no structured offering or public sale. All trading commenced organically, with the only expenses being standard Ethereum gas fees related to smart contract deployment and liquidity pool creation. The intention of the Neiro project was to leverage community-driven resources, and any additional costs were covered by the project’s</td><td>Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}</td></tr>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		initial funding.	
E.38	Conflicts of interest	No known conflicts of interest.	Free alphanumerical text
E.39	Applicable law	Neiro participants are required to comply with the legal requirements of their respective jurisdictions when using Neiro tokens. The Neiro project does not identify a formal legal entity or specify a governing law applicable to the project in its official communications, website, or listings. As Neiro transactions are carried out on the Ethereum blockchain, the applicable law governing these transactions is determined by the legal framework surrounding the operation of the Neiro network and the respective legal frameworks of the jurisdictions where exchanges and users operate.	Drop-down list of applicable laws
E.40	Competent court	Neiro participants must adhere to the legal requirements of their jurisdiction when engaging with the Neiro network. The Neiro project does not identify a formal legal entity or specify a competent court in its official communications, website, or listings. Any legal disputes arising from Neiro token transactions would likely fall under the jurisdiction of courts applicable to the exchanges involved or the legal domicile of the transacting parties.	Free alphanumerical text
Part F - Information about the crypto-assets			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.1	Crypto-asset type	Utility token	Free alphanumerical text
F.2	Crypto-asset functionality	See D.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	Free alphanumerical text
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article			
F.4	Type of crypto-asset white paper	OTHR	OTHR
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	Ethereum Fixed supply of 420,690,000,000 tokens	Free alphanumerical text
F.7	Commercial name or trading name	See DTI in F.13	Free alphanumerical text
F.8	Website of the issuer	neiroeth.io	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2024-08-01	YYYY-MM-DD

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	None	Free alphanumerical text
F.12	Language or languages of the crypto-asset white paper	English	Closed list of EU languages
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	32521	ISO 24165 Digital Token Identifier
F.14	Functionally fungible group digital token identifier, where available	Not available	ISO 24165 FFG DTI
F.15	Voluntary data flag	false	'true' – voluntary 'false' – mandatory
F.16	Personal data flag	false	'true' – Yes 'false' – No
F.17	LEI eligibility	false	'true' – eligible 'false' – not eligible
F.18	Home Member State	Republic of Cyprus	Closed list of EU Member States

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.	Closed list of EU Member States
Part G - Information on the rights and obligations attached to the crypto-assets			
G.1	Purchaser rights and obligations	Purchasers of the Neiro token do not acquire any governance rights or enforceable obligations.	Free alphanumerical text
G.2	Exercise of rights and obligations	Not applicable	Free alphanumerical text
G.3	Conditions for modifications of rights and obligations	This is a community-based crypto, so would be determined by community consensus.	Free alphanumerical text
G.4	Future public offers	Not applicable	Free alphanumerical text
G.5	Issuer retained crypto-assets	Not applicable	Numerical {INTEGER-n}
G.6	Utility token classification	true	‘true’ – Yes ‘false’ – No
G.7	Key features of goods/services of utility tokens	See D.7.	Free alphanumerical text
G.8	Utility tokens redemption	Not applicable	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.9	Non-trading request	false	‘true’ – sought ‘false’ – not sought
G.10	Crypto-assets purchase or sale modalities	Neiro tokens can be purchased and sold via both centralised exchanges (CEXs) and decentralised exchanges (DEXs) (using common trading pairs such as Neiro/USDT, Neiro/ETH, or Neiro/USDC. Neiro is also available on various DeFi platforms and other decentralised venues within the Neiro network.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	There are no specific transfer restrictions at the token level for Neiro tokens. The token is fully transferable on the Ethereum blockchain and holders can freely send or receive it between compatible wallets. However, Neiro tokens may be subject to certain transfer restrictions imposed by exchange platforms to comply with legal, regulatory, and operational requirements. These restrictions aim to ensure compliance with relevant anti-money laundering (AML), know-your-customer (KYC), and sanction-related laws. **Jurisdictional Restrictions** Neiro tokens cannot be transferred or sold to individuals or entities located in jurisdictions subject to sanctions or where the transfer or trading of crypto-assets is restricted under applicable laws and regulations. **Exchange-Imposed Restrictions** Transfers of Neiro tokens may be restricted or	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		blocked when conducted through centralised exchanges if the purchaser's identity cannot be verified in accordance with the exchange's AML/KYC procedures. Transactions involving unverified users may be limited, blocked, or reversed to ensure compliance with anti-money laundering (AML) and counter-terrorism financing (CTF) regulations. **Decentralised Transfers** It should be noted that decentralised exchanges, , generally allow unrestricted peer-to-peer transfers. However, users are individually responsible for ensuring compliance with applicable laws and regulations when using these platforms.	
G.12	Supply adjustment protocols	false	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	Not applicable	Free alphanumerical text
G.14	Token value protection schemes	false	'true' – Yes 'false' – No
G.15	Token value protection schemes description	Not applicable	Free alphanumerical text
G.16	Compensation schemes	false	'true' – Yes 'false' – No
G.17	Compensation schemes description	Not applicable	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.18	Applicable law	Not applicable / undetermined	Drop-down list of applicable laws
G.19	Competent court	Not applicable / undetermined	Free alphanumerical text
		Part H – information on the underlying technology	
H.1	Distributed ledger technology (DTL)	Distributed Ledger Technology (DLT) refers to a decentralised digital infrastructure used for recording transactions across multiple locations simultaneously. Unlike traditional, centralised databases, DLT systems operate without a central authority, relying instead on a network of independent nodes, each maintaining a synchronised copy of the ledger. Transactions are validated through consensus mechanisms, promoting transparency, security, and resistance to tampering. One of the most widely adopted forms of DLT is blockchain, which consists of sequentially linked blocks containing timestamped transaction data. Each block is cryptographically connected to the previous one, making it virtually immutable and resistant to retroactive alteration. Blockchains can also support smart contracts, self-executing agreements that automate processes and enforce rules without intermediaries, thereby increasing trust and efficiency in decentralised systems. Blockchain-based DLT enhances transparency, consumer choice, and interoperability within the broader digital economy. Users can inspect open-source blockchain code, independently verify data integrity, and choose platforms that align with their preferences. The permissionless nature	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		of public blockchains promotes seamless integration and innovation across applications, wallets, and services.	
H.2	Protocols and technical standards	**Primary Network: Ethereum Blockchain** The Neiro token operates on the Neiro Layer 2 network, which is built using Ethereum's infrastructure. This allows Neiro to benefit from Ethereum's security while offering scalability improvements through the use of ZK-rollups. **DLT Type**: **Blockchain** The Neiro token is an ERC-20 token and leverages the Ethereum blockchain's Proof of Stake (PoS) consensus mechanism for transaction validation and smart contract execution. **Consensus Mechanism: Proof of Stake (PoS)** Neiro operates on Ethereum's PoS consensus mechanism, which ensures that transactions are validated by network participants who stake ETH to secure the network. This mechanism reduces energy consumption significantly compared to traditional Proof of Work (PoW) systems while maintaining high network security and decentralisation. **Token Standard: ERC-20** Neiro follows the ERC-20 token standard, enabling seamless interoperability with Ethereum-based wallets, decentralised applications (dApps), and decentralised finance (DeFi) protocols. This compatibility makes it easy for users to interact with Neiro within the wider Ethereum ecosystem.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.3	Technology used	Neiro operates within the Ethereum ecosystem, using its smart contracts for secure and decentralised token transactions. By following the ERC-20 standard, Neiro ensures seamless interoperability with other Ethereum-based platforms, making it accessible across a wide range of dApps and services within the ecosystem.	Free alphanumerical text
H.4	Consensus mechanism	Neiro operates on Ethereum's PoS consensus mechanism, which ensures that transactions are validated by network participants who stake ETH to secure the network. This mechanism reduces energy consumption significantly compared to traditional Proof of Work (PoW) systems while maintaining high network security and decentralisation.	Free alphanumerical text
H.5	Incentive mechanisms and applicable fees	No Formal Incentive Mechanisms Neiro does not implement formal incentive mechanisms such as staking rewards, yield farming, or automated redistribution protocols. The project operates without structured rewards or token distribution schemes offering automatic or passive yield generation. Any incentives within the Neiro ecosystem are community-driven and arise through social media engagement, user activities, and voluntary promotional initiatives conducted by Neiro holders or third-party supporters. **Transaction Fees:** **On-Chain (Ethereum Network)**: ● Transaction (Gas) Fees: Standard Ethereum gas fees apply when transferring Neiro tokens or interacting with smart contracts. These fees	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		fluctuate based on network congestion and are paid in ETH. ● Decentralised Exchange (DEX) Swap Fees ● Typical swap fees range from 0.25% to 0.30% per trade, depending on the decentralised exchange and liquidity pool configurations. **Centralised Exchanges (CEX)**: ● Trading Fees: Vary by platform, commonly ranging between 0.1% and 0.5%. ● Withdrawal Fees: Exchanges may charge fees when withdrawing Neiro tokens to external wallets, with amounts determined individually by each platform. ● Fiat Conversion Fees: Apply where fiat-to-crypto or crypto-to-fiat conversions are made through exchanges offering such services.	
H.6	Use of distributed ledger technology	false	‘true’ – Yes, DLT operated by the issuer or a third-party acting on the issuer’s behalf ‘false’ – No, DLT not operated by the issuer or a third-party acting on the issuer’s behalf
H.7	DLT functionality description	Neiro utilises the Ethereum blockchain as its DLT, operating as a public, decentralised, and permissionless system for recording and verifying transactions. As an ERC-20 token, Neiro operates through smart contracts on Ethereum, enabling users to transfer tokens, trade on decentralised exchanges, and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		interact with dApps within the Ethereum ecosystem. Transactions are validated through Ethereum's PoS consensus mechanism, ensuring network security and data integrity. Neiro holders retain full control over their assets through non-custodial wallets, with all transactions being transparent, verifiable via blockchain explorers, and permanently recorded on the blockchain. The DLT functionality ensures that Neiro benefits from Ethereum's interoperability, security, and decentralisation, while avoiding reliance on any issuer-operated infrastructure.	
H.8	Audit	false	'true' – Yes 'false' – No
H.9	Audit outcome	Not applicable	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	The offering and subsequent trading of Neiro tokens carry inherent risks commonly associated with the crypto-asset market, particularly within the blockchain and decentralised finance (DeFi) sectors. These risks include: **Market Volatility** The price of Neiro tokens may experience significant fluctuations due to changes in market sentiment, promotional activities, broader macroeconomic factors, and the evolving regulatory environment. These fluctuations could result in financial loss for	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		holders or traders of the token. **Liquidity Risk** There is no guarantee that Neiro tokens will maintain a sustained or active secondary market. Factors such as trading volume, token holder concentration, and exchange availability can affect the ease of buying or selling Neiro tokens at any given time. **Regulatory Risk** The regulatory framework for crypto-assets, including Neiro, is still evolving and is subject to change. Future legislation may impose new restrictions or requirements on Neiro holders, including reporting obligations, eligibility criteria, or holding thresholds. As such, the regulatory environment surrounding Neiro could impact its usability, trading, or market value. **AML/KYC Compliance** Participation in the purchase or trade of Neiro tokens through centralised exchanges (CEXs) or fiat on-ramps may require compliance with anti-money laundering (AML) and know-your-customer (KYC) regulations. Users in certain jurisdictions may face restrictions, delays, or account limitations if verification requirements are not met, hindering their ability to buy, sell, or hold Neiro tokens. **Market Manipulation** As a publicly traded crypto-asset, Neiro tokens may be susceptible to manipulative practices such as wash trading, pump-and-dump schemes, or coordinated speculation. These practices could distort price discovery and	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		affect market integrity, which may lead to unexpected volatility in the token's price. **Operational Risk** Disruptions or technical failures affecting exchanges or the Neiro blockchain could impact the availability or timely transfer of Neiro tokens. Such disruptions may include issues related to platform downtime, transaction delays, or network failures.	
I.2	Issuer-related risks	Neiro is a project designed to enhance Ethereum scalability and support decentralised applications (dApps). However, as a decentralised project, Neiro is not issued by a regulated financial institution, and several risks remain: **Decentralised Coordination** The ongoing success of the Neiro token depends on the efforts of the development team, the community, and external partners. Any disruption in coordination or management could impact the development of the token, its adoption, or its ecosystem. **Brand Dependency** The value of Neiro tokens is tied to the success of the Neiro network and its ability to achieve widespread adoption in the blockchain ecosystem. Any changes to the project's direction, loss of popularity, or reputational damage could significantly affect the token's demand and value. **Legal Alignment** Misalignments between the Neiro project's activities and local regulatory frameworks	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		(such as those surrounding consumer protection, taxation, or financial regulation) could lead to enforcement actions or reputational harm. As the blockchain space continues to evolve, legal challenges may arise that could impact Neiro's operations.	
I.3	Crypto-assets-related risks	Neiro is a utility token designed for use within the Neiro ecosystem, focusing on decentralised applications and Ethereum scalability. Its value is driven by market sentiment, ecosystem adoption, and community engagement rather than financial utility. **Speculative Nature** Neiro should be considered a speculative asset. Its value is largely driven by internet trends, market speculation, and community enthusiasm, which may not necessarily reflect the token's intrinsic value or long-term utility within the Neiro network. **Blockchain Dependency** Since Neiro is built on the Neiro network (Layer 2 on Ethereum), it is subject to risks inherent in this infrastructure, including: ● Network congestion and delays in transaction processing. ● Fluctuations in transaction fees, which depend on the Ethereum network's gas prices. ● Potential technical issues, such as chain forks, protocol upgrades, or bugs. ● Dependence on Ethereum for security and interoperability with other networks.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Future Use Cases While Neiro aims to facilitate Ethereum scalability, it also may expand to provide broader financial features, NFTs, or other dApp integrations. These future developments are speculative, and the project has not released a formal roadmap. Future features may evolve based on community demand and network growth.	
I.4	Project implementation-related risks	The implementation of new functionalities for Neiro is subject to significant variation based on community involvement, available resources, and external collaborations: **Technical Limitations** New features, such as integrations with other networks or financial products, may face delays or fail to be delivered due to technical challenges, resource constraints, or dependencies on third-party developers or collaborators. **Regulatory Developments** Changes in cryptocurrency regulations, advertising rules, token promotion laws, or financial regulations could impact the future development of Neiro. These changes may require modifications to the project's framework, operation, or use cases. **Third-Party Reliance** Neiro depends on ongoing relationships with external developers, ecosystem partners, and key contributors. Any disruption in these relationships could delay or hinder the project's progress and visibility.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
I.5	Technology-related risks	The functionality of Neiro is built on the Ethereum network and its Layer 2 solution. It relies on smart contracts and distributed ledger technology **Smart Contract Vulnerabilities** If the Neiro token contracts or the underlying code has not been properly audited, they could contain vulnerabilities that might be exploited, resulting in the loss of funds or disruption of network services. **Network Disruptions** Disruptions affecting the Ethereum or Neiro networks could delay transactions, cause downtimes, or disrupt user access to tokens. Network upgrades, technical issues, or consensus failures could all contribute to such disruptions. **DEX Integration Risks** Trading Neiro tokens on decentralised exchanges exposes users to risks such as: Slippage in price. **Front-running by other traders**. Interface bugs or poor user experience. Liquidity pool manipulation leading to distorted prices.	Free alphanumerical text
I.6	Mitigation measures	To mitigate the risks mentioned above, Neiro has taken several steps to enhance the stability and integrity of the token: **Exchange Listings** Neiro is available on major centralised exchanges (CEXs) and decentralised exchanges (DEXs), which helps improve liquidity and user access. **Transparent Distribution** The Neiro token was launched transparently,	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		ensuring fair market entry with no pre-sale or unfair allocation. **Ecosystem Partnerships** Neiro is collaborating with blockchain projects and decentralised finance platforms to expand its ecosystem and increase utility. **Community Engagement** Active community-building and marketing efforts are being made to enhance the token's visibility and adoption across the blockchain space.	
Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts			
J.1	Adverse impacts on climate and other environment- related adverse impacts	Neiro operates on the Ethereum network, which uses Proof of Stake (PoS) to validate transactions and ensure network security. This consensus mechanism significantly reduces energy consumption compared to traditional Proof of Work (PoW) models used by networks. As a result, the environmental impact of Neiro is relatively low, with much less electricity required for transaction validation and network operations compared to PoW blockchains. However, as with any blockchain network, Neiro's operations still indirectly contribute to overall energy consumption due to the computational activities of network validators and participants. While PoS reduces energy consumption, Neiro has not yet implemented specific environmental policies, offset strategies, or climate mitigation plans.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
Part K - Disclosure under Article 8(4) of of Regulation (EU) 2023/1114			
K.1	Disclosure under Article 8(4) of of Regulation (EU) 2023/1114	Neiro is a utility token within the meaning of Regulation (EU) 2023/1114 (MiCA). Neiro has no rights or obligations within the Stellar network. It does not grant governance powers, enforceable claims, or guarantees of utility. Under Article 3(1), point (5), a ‘crypto-asset’ is a digital representation of a value or of a right that is able to be transferred and stored electronically using DLT or similar technology. One of the most well-known forms of DLT is a blockchain, which is a subtype characterised by its use of a chain of blocks to manage the ledger. Each block contains a list of transactions and is cryptographically linked to the previous block, ensuring that the data once recorded, cannot be altered retroactively without altering all subsequent blocks. Neiro is issued on the Ethereum blockchain in order to leverage these benefits. Neiro serves purely as a utility token, allowing holders to participate in network-related activities such as to facilitating credit transactions and financial services, bridging traditional finance with decentralised finance (DeFi). Neiro does not grant governance rights or enforceable obligations. Accordingly, Neiro meets the definition of a ‘crypto-asset’ within the meaning of Article 3(1), point (5) of MiCA. Under Article 3(1), point (7) of MiCA, ‘electronic money token’ or ‘e-money token’ means a type of crypto-asset that purports to maintain a stable value by referencing the value of one official currency. Neiro serves purely as a utility token, allowing holders to participate in	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		network-related activities. Neiro does not grant governance rights or enforceable obligations. Neiro is not denominated in, or pegged to, any fiat currency. It does not purport to maintain a stable value by referencing the value of one official currency. Neiro fluctuates relative to fiat currency and other digital tokens, and depends on factors such as supply and demand. Neiro is not intended to be a medium of exchange accepted by the public, or a section of the public, as payment for goods or services. Accordingly, Neiro is not an electronic money token within the meaning of Article 3(1), point (7) of MiCA. Under Article 3(1), point (6) of MiCA, an 'asset-referenced token' means a type of crypto-asset that is not an electronic money token and that purports to maintain a stable value by referencing another value or right or a combination thereof, including one or more official currency. Neiro serves purely as a utility token, allowing holders to participate in network-related activities. Neiro does not grant governance rights or enforceable obligations. Neiro does not purport to maintain a stable value by referencing another value or right or a combination thereof, including one or more official currency. Rather, Neiro fluctuates relative to fiat currency and other digital tokens, and depends on factors such as supply and demand. As explained above, it is also not an "e-money" token within the meaning of Article 3(1), point (7) of MICA. Accordingly, the Neiro is not an asset-referenced token within the meaning of Article 3(1), point (6) of MiCA.	