

Hemp Access Token (HATX)

Crypto-Asset White Paper: Explanatory Notes

Field	Data
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Issuer	HATX Technologies Kft.
Company form	limited liability company (Kft.)
Registered seat	Hungary, 6781 Domaszék, Béke utca 3.
Company registration number	06-09-031394
Tax number	33091633-1-06
Website	https://hempaccessglobal.com
Contact	legal@hempaccessglobal.com, +36706794347
Token name / Ticker	Hemp Access Token / HATX
Token type	other crypto-asset (a utility token in terms of its practical function)
Blockchain / standard	Base (Ethereum L2), ERC-20 (OpenZeppelin), verified on BaseScan
Total supply	100,000,000 HATX
Issue price per unit	0.10 EUR / HATX
Competent authority (notification)	Magyar Nemzeti Bank (MNB)
Date of notification (submission) of the white paper	31 August 2026

Important: This document contains the explanatory notes to the MiCA crypto-asset white paper for the Hemp Access Token (HATX). It does not constitute investment advice, financial or tax advice, a securities prospectus, or a promise of return. The purpose of HATX is to provide utility type access, discounts, priority and ecosystem benefits.

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Mandatory statement

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

The management body of the offeror declares that, to the best of its knowledge, this white paper complies with the applicable legal requirements, the information contained in it is fair, clear and not misleading, and the document contains no material omission that would materially affect its assessment.

Important warning

- The Hemp Access Token may lose its value in part or in full.
- The token is not transferable in all circumstances.
- The liquidity of the token may be limited.
- Because HATX is a utility token, it may happen that the token cannot be exchanged for the products, services, discounts or access described in this white paper, in particular in the event of delay, modification, failure, market obstacle or discontinuation of the project.
- The token is not covered by any investor compensation scheme or deposit guarantee.
- The HATX token is not a share, not a bond, not an investment unit, not an ownership interest, not a profit-sharing right, not an interest-bearing instrument, and does not confer any claim on the profit, assets or results of the Issuer or any project company.

Summary

Warning: This summary should be read as an introduction to the crypto-asset white paper. The prospective token holder should base any decision to acquire HATX on the content of the white paper as a whole and not solely on the summary. The acquisition of HATX does not constitute an investment in a financial instrument, and the Union investor protection rules do not apply to it. The public offer of HATX does not constitute an offer or solicitation to purchase financial instruments; any such offer or solicitation may be made solely by means of a prospectus or another offer document under the applicable national law. This crypto-asset white paper does not constitute a prospectus under Regulation (EU) 2017/1129, nor any other offer document under Union or national law.

The Hemp Access Token (HATX) is a utility token that functions as a digital access key within a real, natural material based construction ecosystem. The holder of the token may receive discounts, priority access, partnership opportunities and ecosystem benefits. HATX promises no financial return and grants no ownership interest, dividend, interest or guaranteed buyback.

The Issuer is a limited liability company registered in Hungary and established for this purpose, which deals exclusively with the token and with ecosystem coordination, and is legally separate from the cooperatives and project companies participating in the ecosystem. The token is issued on the Base network (Ethereum L2) in an ERC-20 compatible form. The total supply is 100,000,000 HATX. The public offer covers the entire community allocation of 35,000,000 HATX at a unit price of 0.10 EUR. The Issuer makes the tokens available gradually; according to the planned schedule, approximately 10-15 million HATX become

available in the first 6-12 months. The public offer of the token starts from Hungary and, based on the notification of the white paper, may also become available in other Member States of the European Union.

1. Executive summary

The Hemp Access Token, HATX for short, is a utility token whose purpose is to function as a digital access key within a real, natural material based construction ecosystem.

The main goal of the project is to accelerate the practical adoption of natural material based construction products and systems, such as hemp, straw, clay and their modern construction applications. The central elements of this are the processing of natural raw materials, the production of construction grade raw materials, the manufacturing of natural based building materials, the development of Kendercell and other natural construction systems, and the delivery of affordable, natural material based condominium projects through separate project companies.

The HATX token does not promise a financial return. The purpose of the token is for the holder to receive discounts, priority access, partnership opportunities and ecosystem benefits.

The core idea of the project is that Europe will increasingly need healthier, lower environmental impact, natural and affordable construction solutions. Industrial hemp, straw, clay and other natural raw materials can play a prominent role in this.

HATX is intended for individuals, contractors, developers, building material buyers, home buyers, partners and community actors who wish to connect early to a natural building material construction system.

2. Mission and vision of the project

2.1 Mission

The mission of the project is to organise, at an industrial, commercial and construction level, the modern construction use of natural material based building materials, in particular hemp, straw and clay. The goal is not merely to create a token, but to build a real economic system in which the token provides concrete access and practical benefit.

- development of the natural material based building material industry
- building natural raw material processing capacities
- organising construction grade raw material supply
- bringing natural based building materials to market
- creating affordable, healthier residential buildings
- building a community and partner ecosystem

2.2 Vision

The long-term goal of HATX is to be the basis of a digital entry and discount system that connects the producers, suppliers, processors, manufacturers, contractors, real estate developers, home buyers and professional partners of natural building materials, and the community interested in natural construction.

According to the longer-term vision of the project, the HATX token may connect not only to a local construction discount system but also to a broader, natural material housing ecosystem. Within this framework, HATX may be suitable for managing membership, waiting list, discount, project access and community participation entitlements in housing models that are realised through separate project companies, cooperatives, partners or local collaborations.

2.3 Principle

The meaning of the token comes from its use. The value of HATX is given not by any price promise of the Issuer, but by the actual ecosystem use, the discount system, the access and the community acceptance.

3. The market problem

3.1 Processing gap

The construction use of natural raw materials does not stall because of a lack of interest, but because there is little organised processing and preparation capacity. Construction grade, uniform, predictable raw material must be produced from the raw input material.

3.2 Material manufacturing gap

On the market of natural based building materials there are few products available in larger quantities and reliable quality. The market needs standardised materials, predictable recipes, a stable supplier background, construction quality assurance and competitive pricing.

3.3 High housing prices

The price of newly built homes is difficult to afford on many European and Central European markets. The goal of the project is that, with the help of natural material based building materials and a more efficient project structure, condominium models are created that in the long run can result in healthier, more sustainable and more affordable homes.

3.4 Fragmented market

Currently the actors of natural material based construction often operate separately. The goal of HATX is to organise this fragmented market into a digital and business ecosystem.

3.5 International housing and sustainability challenge

Affordable, healthier and lower environmental impact housing is not solely a Hungarian or European problem. The project therefore aims, in the long run, to develop a model that, with appropriate local legal, financial and technical adaptation, can also be applied in other countries.

4. The solution: Hemp Access Token

HATX is a utility token that can provide access, discounts, priority and ecosystem benefits to the holders of the token.

4.1 The essence of the token

HATX is not an investment product. HATX is a digital access instrument that enables the holder of the token to gain a more favourable position within the natural material based construction ecosystem built by the project.

4.2 What the token can be used for

- for a discount when purchasing natural material based building materials
- for discounted access to Kendercell, straw based, clay based or other natural products
- for a pre-booking option at limited manufacturing or construction capacities
- for priority access to new building material products
- for a discount in residential real estate projects realised by project companies
- for early interested party or buyer status in condominium projects
- for access to partner offers
- for access to closed ecosystem information
- for participation in the community feedback and proposal system
- for the verification of membership or community access levels
- for recording waiting list or interested party status in natural material housing projects
- for access or discount options, under separate rules, related to international partner projects

4.3 The main appeal of the token

The appeal of the HATX token is not a price promise. The main appeal is the practical discount, the early access, the priority, the building material and project connection, the real economic background and the entry into a natural material based construction system.

5. Issuer and corporate structure

5.1 Issuer

The issuer of the HATX token is a limited liability company (Kft.) registered in Hungary and established for this purpose, which deals exclusively with token related activity and with ecosystem coordination.

Field	Data
Issuer (company name)	HATX Technologies Korlátolt Felelősségű Társaság
Company form	limited liability company (Kft.)
Registered seat	6781 Domaszék, Béke utca 3.
Company registration number	06-09-031394
Tax number	33091633-1-06
Executive officer(s)	Horesnyi Béla (managing director, sole representation)
Ownership structure	Horesnyi Béla (100% business share)

The task of the Issuer is the issuance of the token, the publication of the white paper, the handling of notification and information obligations under MiCA, the operation of the utility system linked to the token, complaints handling, token holder communication and the publication of ecosystem rules.

5.2 Separation from cooperatives and project companies

The Issuer is legally and economically separate from the housing cooperatives participating in the ecosystem, as well as from the processing, building material manufacturing, commercial, contractor and real estate developer project companies. This separation is necessary because token issuance, building material manufacturing and real estate development carry different legal, financial and operational risks. The token can be used together with the cooperatives and the project companies, but it does not mix their obligations and risks with those of the Issuer.

5.3 Role of project companies and cooperatives

The condominium and housing projects may be realised in separate project companies or cooperatives. The HATX token in itself does not grant an ownership interest in these. The holder of the token may, in accordance with the applicable rules, receive a discount, a pre-booking option or priority access in certain projects.

The entitlements linked to the HATX token do not replace the contracts concluded by the given project company, cooperative or other local legal actor. The actual housing, use, lease, booking or purchase right is in every case based on a separate contract and on the rules of the given project.

6. Functions of the HATX token

6.1 Building material discount

- Kendercell
- hemp brick
- hemp, straw or clay based masonry units
- hemp, straw or other natural based prefabricated elements
- hemp shiv, straw fibre, clay and other natural based products
- construction systems combined with a binder
- natural building material packages

6.2 Construction and project preparation discount

- project preparation service
- material calculation
- reservation of construction capacity
- partner contractor offers
- other discount approved by the HATX community

6.3 Condominium project discount

- early interested party status
- pre-booking option
- discounted booking fee
- purchase price discount
- larger discount at a higher token level
- priority for specified home types
- other discount approved by the HATX community

Important: the discount can always be applied in accordance with the separate rules and contractual conditions of the given project company or cooperative. In these, the HATX token performs solely an access, discount, priority or community participation function; the actual rights are always determined by a separate contract.

6.4 Partner discounts

- material discount
- service discount
- logistics discount
- design or construction discount
- more advantageous access to limited capacities
- other discount approved by the HATX community

6.5 Community participation

The holders of the token may give feedback and make proposals, among other things, on product development directions, the region of the next project, discount programmes, partner services and building material packages.

This does not mean any corporate voting right, and does not grant any legal decision-making entitlement in the Issuer or in any project company.

7. What the HATX token does not grant

To avoid misunderstandings, the HATX token does not grant:

- an ownership interest in the Issuer
- an ownership interest in project companies or cooperatives
- a right to dividend
- interest
- profit sharing
- a claim on the results of the Issuer
- a claim on the results of project companies
- a claim on real estate
- a claim on the assets of the Issuer or project companies
- a right to a liquidation surplus
- a corporate voting right
- a board or ownership decision-making right
- a guaranteed buyback
- guaranteed secondary market liquidity
- a guaranteed listing on an exchange
- a guaranteed price increase
- an automatic lease right, use right or housing right

The purpose of the HATX token is to provide access, discounts, priority and ecosystem benefits.

8. Tokenomics

Token name: Hemp Access Token. Ticker: HATX. Type: other crypto-asset (with utility type usefulness).

8.1 Total token supply

100,000,000 HATX. No further token issuance is planned.

8.2 Community and public access allocation, schedule

The community and public access allocation is 35,000,000 HATX. The public offer under this white paper covers the full quantity of 35,000,000 HATX. This does not mean that the entire quantity enters circulation immediately: the Issuer makes the tokens available gradually, in line with the development of the utility system. According to the planned schedule, the quantity actually made available in the first 6-12 months is approximately 10,000,000 - 15,000,000 HATX, with the further quantity following during the remainder of the subscription period, in line with milestones, real utility functions, partner programmes and ecosystem development results. This schedule is indicative and the Issuer may modify it within the subscription period.

The goal is not a one-off capital raise based solely on token sales, but the creation of gradual, use oriented token availability that adjusts to the development of the HATX utility system.

8.3 Allocation

Category	Amount	Share
Community / public access allocation	35,000,000 HATX	35%
Ecosystem and discount programme	20,000,000 HATX	20%
Treasury / operating reserve	11,000,000 HATX	11%
Liquidity and market building reserve	10,000,000 HATX	10%
Strategic partners	8,000,000 HATX	8%
Team and founders	16,000,000 HATX	16%
Total	100,000,000 HATX	100%

8.4 Vesting and lock-up

For the tokens reserved for the team and founders, a minimum 24-month cliff applies, followed by 36-month linear vesting. For the tokens reserved for strategic partners, a 12-36 month lock-up or gradual release applies, based on principles fixed in advance and communicated publicly.

The management of the treasury, the liquidity reserve and the administrative permissions may be carried out using a Safe multisig and a Timelock. The liquidity reserve is to be managed separately, and the locking of LP positions or the application of another transparent security solution is recommended.

8.5 Token use mechanism

The use of the HATX token may take place for activating a discount, verifying an entitlement level, obtaining a pre-booking status, taking up partner discounts and participating in ecosystem programmes.

The HATX token may be consumed when certain utility functions are used, if the applicable ecosystem rules so provide. The purpose of the token use mechanism is in every case to support the operation of the utility system and the ecosystem, not to provide a financial return for the holders of the token.

8.6 Discounted partner and contributor allocation

The Issuer may make HATX tokens available to genuine ecosystem partners and contributors (for example suppliers, contractors, professional collaborators) at a discounted unit price of 0.06 EUR per token (60% of the public price, that is a 40% discount). This discounted allocation comes from the Strategic partners pool, not from the public allocation, and does not affect the public 0.10 EUR unit price.

The discounted partner tokens are subject to the lock-up or vesting under point 8.4, and the Issuer publishes the conditions of the discounted group based on the principle of equal treatment. The discounted allocation is intended solely for genuine partners and contributors, without any return promise. The involvement of purely financial investors takes place not through the token but through the business share of the Issuer company, so that the utility character of the token is not impaired.

9. Discount levels

HATX token holders may reach different entitlement levels based on the applicable ecosystem rules linked to the token. The HATX quantity required for the discount levels may be reviewed from time to time, in particular if the market price, liquidity, availability of HATX or the size of the ecosystem changes significantly.

Level	Access logic	Possible entitlement
Starter	low HATX participation level	basic community access, basic information
Builder	medium HATX participation level	smaller discounts, advance information
Pro Builder	higher HATX participation level	higher discount, pre-booking option
Partner	significant HATX level or contractual partner status	project access priority, larger discounts
Industrial	based on an individual agreement	individual partner conditions, larger volume cooperation

At the launch of the system the Issuer determines the indicative token quantities belonging to the individual levels in the ecosystem rules published on its official website, according to objective conditions that are the same for everyone. The exact token quantities, discounts, conditions and restrictions are also set out in those rules. The levels may be reviewed solely on the basis of rules published in advance.

For early participants the Issuer may establish a separate early participant status, which may allow the entitlement level obtained in the first period to be maintained in part or in full despite later changes to the rules, under the conditions set out in the separate rules.

The discount levels do not constitute a financial return, a price promise, profit sharing, an ownership interest or a claim. Their purpose is solely to provide access, discounts, priority and ecosystem benefits.

10. HATX ecosystem support mechanism

The project may apply a so-called HATX ecosystem support mechanism, the purpose of which is to support the long-term operation, discount system, utility reserve and partner incentives of the ecosystem.

10.1 Possible mechanism

The Issuer may, at its own discretion, support the operation of the ecosystem by topping up the utility treasury, operating discount programmes and providing partner incentives. This does not constitute a buyback, price stabilisation or any financial return.

10.2 Important restriction

This mechanism is not guaranteed, not automatic, not mandatory, not profit sharing, not a dividend, not a price stabilisation promise, does not constitute guaranteed demand for the token, and does not provide a financial return. The Issuer does not undertake to buy back HATX tokens at any time, or to maintain, increase or stabilise the price of the token.

10.3 Communication principle

The HATX ecosystem support mechanism may be communicated solely as an ecosystem and utility purpose. It is prohibited to communicate it as an investment return, a guaranteed price increase or a profit redistribution.

The Issuer does not seek to influence the price of the token and respects the rules on market abuse.

11. Details of the offer

Item	Data
Token offered	Hemp Access Token (HATX), utility token
Issue price per unit	0.10 EUR / HATX
Quantity offered under this offer	35,000,000 HATX
Planned schedule for the first 6-12 months	approximately 10,000,000 - 15,000,000 HATX (indicative)
Maximum consideration under this offer	3,500,000 EUR (35,000,000 HATX x 0.10 EUR)
Offer period	from 30 September 2026 to 29 September 2027, that is, at most 12 months from the publication of the white paper
Target countries	Hungary as the starting Member State; EU-wide validity based on the notification of the white paper; certain countries excluded (see point 11.3)

Item	Data
Discounted partner / contributor price	0.06 EUR / HATX (from the Strategic partners pool, with a lock-up)
Payment method	bank transfer in euro or in Hungarian forint, as well as, where made available by the Issuer, bank card payment or a payment gateway operated through a licensed service provider; in every case the funds received are transferred to the segregated account of the Issuer held at a credit institution and used exclusively for this purpose, where they are safeguarded by the credit institution; within the framework of this public offer the Issuer does not accept consideration in crypto-assets
Admission to trading	none at launch; later at most through a licensed external service provider, not guaranteed

In the case of payment in Hungarian forint, the conversion takes place at the official EUR/HUF exchange rate published by the Magyar Nemzeti Bank and valid on the day of the confirmation of the order. The confirmed forint amount is valid until the payment deadline indicated in the confirmation. If the Magyar Nemzeti Bank does not publish an exchange rate on the day of the confirmation, the last exchange rate published before that day applies. In the case of a payment received after the expiry of the payment deadline, the Issuer issues a new confirmation with a new exchange rate, or refunds the payment.

During the public offer the Issuer may also make available further payment solutions, in particular bank card payment or a payment gateway operated through a licensed service provider. In such cases as well, all funds received are transferred to the segregated account of the Issuer held at a credit institution and used exclusively for this purpose, where they are safeguarded by the credit institution.

If HATX is later admitted to trading, the token may also become obtainable on the secondary market in exchange for USDC. This does not form part of the public offer of the Issuer, it is voluntary, takes place at the user's own risk, and the consideration does not flow to the Issuer.

11.1 Right of withdrawal

Retail holders who qualify as consumers may withdraw from the agreement for the purchase of HATX within 14 calendar days from the day of the agreement, without giving reasons and without any fee or cost.

The right of withdrawal does not apply to the retail holder if HATX was admitted to trading before its purchase, and also if the Issuer has set a time limit on the public offer and the subscription period has closed.

The declaration of withdrawal must be sent to the e-mail address legal@hempaccessglobal.com. The withdrawal does not entail any fee, cost or adverse legal consequence.

In the event of withdrawal, the Issuer reimburses all payments received from the retail holder, including any costs, without undue delay and at the latest within 14 days from the receipt of the notice of withdrawal. The reimbursement is made using the same means of

payment that the holder used for the original transaction, unless the holder expressly agrees otherwise, and the reimbursement does not entail any fee or cost for the holder.

During the acquisition process, before the payment, the Issuer separately informs the retail holder about the right of withdrawal.

11.2 Protection of funds received

During the public offer, the funds and crypto-assets received from acquirers are handled and safeguarded by a licensed third party, separately from the own assets of the Issuer, on a segregated account. The funds received are not commingled with the own assets of the Issuer. If the offer is withdrawn for any reason, the Issuer returns the funds received to the acquirers without undue delay.

11.3 Excluded and restricted countries

The public offer is directed at the European Union. HATX may not be offered or sold in countries where this would be contrary to law, in particular to persons of the United States of America, and in countries affected by international sanctions. The Issuer excludes the excluded and restricted countries by geoblocking, by a buyer declaration made at the time of the order, by checking the named bank payment trail and by screening against sanctions lists. In the case of payment in crypto-assets or the opening of a payment gateway, customer identification is carried out by a licensed external service provider. The HATX model may in the future become available in other, non-EU countries solely through adaptation to the given country's own legal, tax and financial rules, not automatically.

12. Planned use of the funds received

The purpose of the funds received from sales or access allocation linked to the HATX token is primarily to strengthen the practical utility of the token, the operation of the ecosystem, the technological background, the compliance processes, the partner system and the discount programmes.

Purpose	Planned share
Technology, token system, customer journey, web platform	15%
Legal, compliance, MiCA, accounting, audit	15%
Creation of ecosystem, discount and utility programmes	15%
Natural material based building material development and manufacturing preparation	15%
Condominium project preparation and initial development costs	20%
Preparation of the partner network, contractor and supplier system	8%
Marketing and community building	7%
Operating reserve	5%
Total	100%

The issuance of the HATX token may contribute to the preparation of the natural material based construction and condominium projects that form the basis of the ecosystem; however, it is not to be regarded as the exclusive or full source of financing of individual real

estate development investments. Such investments may be realised with the involvement of separate project financing, banking, cooperative, partner or other regulated financing sources.

Based on its own business decision, the Issuer may itself participate, from the funds received and its other resources, in the financing of certain construction and condominium projects for the sake of the development of the ecosystem. The return arising from this belongs to the Issuer company and does not, in any form, create a financial benefit, return, interest or claim for the holders of the token. The holder of the token receives solely access, discount and ecosystem participation entitlements, while the realisation of the construction projects remains the business activity of the Issuer and the project companies.

The purpose of HATX is not for the holder of the token to obtain a direct ownership right, a claim, a dividend, interest, profit sharing or a guaranteed return. The use of funds may not serve a price promise or a guaranteed investment return.

13. Technological background

13.1 Blockchain infrastructure

The HATX token is issued on the Base network (Ethereum L2), in the form of an ERC-20 compatible token, with an OpenZeppelin based contract and with source code verified on BaseScan. The address of the HATX smart contract on the Base network is: 0xabf1ab94d0d4b2bec1aa34632decd7cc00edd2d8. The digital token identifier of the crypto-asset under the ISO 24165 standard (DTI) is: 5SSLD82DZ. The functionally fungible group identifier (FFG-DTI) is: QX70H0898. The DTI codes were issued by the Digital Token Identifier Foundation (DTIF) as the registration authority under ISO 24165. The token has a fixed supply and does not contain any tax, blacklist or hidden mint function. The chosen network is widely supported, operates with low transaction cost, is technically stable, auditable and wallet compatible. Because Base settles on the Ethereum proof-of-stake network, its energy demand is orders of magnitude lower than that of proof-of-work based networks.

13.2 Planned settlement / liquidity pair

During the technical and market preparation of the project, the HATX/USDC pair may be regarded as the primary planned liquidity or settlement pair, if HATX later enters trading through an appropriate external service provider. This does not constitute a guaranteed listing on an exchange, guaranteed secondary market liquidity, a guaranteed price or a price increase promise. EUR may appear primarily as a currency for fiat payment, customer payment, accounting and settlement.

The initial liquidity may be intentionally limited, and its provision takes place at the discretion of the Issuer. Small initial liquidity may result in greater price fluctuation and greater slippage; therefore the initial market presence is not to be regarded as a sign of a stable price or guaranteed sellability.

13.3 Smart contract principles

- fixed total token supply
- OpenZeppelin based, audited ERC-20 template
- source code verified on BaseScan

- without tax, blacklist and hidden mint function
- transparent allocation
- manageability of vesting and lock-up
- minimisation of admin permissions
- application of a Safe multisig and a Timelock for critical operations
- transparent management or locking of LP positions
- possibility of a security audit
- later utility integration

13.4 Security audit

The Issuer aims for the smart contract to undergo a security review before the public token sale. Technological risk cannot be fully excluded.

14. Sustainability and energy use disclosure

MiCA and the related regulatory technical standards make mandatory the publication of information on the principal adverse environmental and climate impacts of the technology underlying the crypto-asset.

HATX is issued on the Base network (Ethereum L2, OP Stack), which settles on the Ethereum proof-of-stake network. The proof-of-stake mechanism does not require the energy-intensive computational competition characteristic of proof-of-work based networks; therefore the network-level energy use and the related estimated greenhouse gas emissions are orders of magnitude lower.

According to the September 2022 report of the Crypto Carbon Ratings Institute (CCRI), the annual energy use of the Ethereum proof-of-stake network was 2,600.86 MWh (approximately 2.6 million kWh), its estimated annual emissions were 869.78 tonnes of CO_{2e}, and the per-transaction energy was 6.29 Wh (0.0063 kWh). According to an estimate updated with the 2026 node count (Etherscan Node Tracker, 11 September 2026: 11,113 nodes), the annual consumption of the network is approximately 6.1 million kWh and the per-transaction energy is approximately 0.012 kWh. Base, as a batching L2, processes transactions in an aggregated manner, so the effective per-transaction footprint is even lower. These values are indicative. The above values are to be understood at the level of the entire network and do not represent the consumption attributed to HATX; the estimated values attributable to HATX are contained in the structured disclosure below.

The Issuer undertakes to publish on its official website, and to update regularly, the quantitative indicators on the network's energy use and estimated environmental impacts in accordance with the applicable regulatory technical standards.

The structured disclosure below contains the mandatory data under the regulatory technical standards, with an estimate for the first period of issuance based on public data from the literature.

Legal Entity Identifier (LEI) of the Issuer: 648800FSNHLNOEHZRB60

Network and consensus mechanism concerned: Base (Ethereum L2, OP Stack), which settles on the Ethereum proof-of-stake mechanism.

Reporting period: 30 September 2026 - 29 September 2027 (the first 12 months of issuance, estimation period).

Calculation methodology: transaction-based allocation of the network's energy consumption. Based on the estimated 2026 annual consumption of the Ethereum network (11,113 nodes x 547.01 kWh = 6,078,922 kWh) and the annualised lowest daily transaction count (498,225,000), the energy per transaction is 0.0122 kWh. As a precaution, the calculation uses an upper bound of 0.03 kWh per transaction, which also covers the consumption of Base's (L2) own infrastructure. The assumed annual number of HATX transactions is approximately 50,000. The step-by-step derivation and the sources are set out in Part J (field S.9) of the white paper in iXBRL format.

Mandatory indicator, annual energy use attributed to HATX: approximately 1,500 kWh/year (conservative estimate). This value is the product of the estimated annual number of HATX transactions and the specific energy per transaction, that is, only the part of the total network consumption attributable to HATX, not that of the entire network.

Supplementary indicator, estimated annual greenhouse gas emissions (scope 1 and 2): approximately 500 kg CO₂e/year (conservative estimate; 1,500 kWh x 0.33 kgCO₂e/kWh, using the network-specific emission factor according to CCRI).

The Issuer has not identified any other adverse impact (for example the generation of electronic waste or water use), as it does not operate any hardware of its own. The annual energy consumption does not exceed 500,000 kWh; therefore the disclosure of the supplementary indicators under Commission Delegated Regulation (EU) 2025/422 is voluntary.

The Issuer publishes the final, verified values on its official website based on a recognised, independent methodology (for example CCRI) and updates them regularly.

15. KYC/AML, payment, custody and customer journey

15.1 Use of licensed external service providers

In the first phase, the Issuer accepts payment by bank transfer, as well as through a payment gateway made available during the public offer. In the case of bank transfer, identification takes place through the payment trail: the payment must arrive from a bank account held in the name of the person placing the order. In the case of payment through a payment gateway, customer identification and sanctions screening are carried out by the licensed external service provider engaged for this purpose. In addition, regardless of the payment method, the Issuer carries out screening against sanctions lists and applies geoblocking. In the case of the introduction of payment in crypto-assets or a custody solution, the Issuer engages a licensed external service provider specialised in these tasks. This reduces the initial technological, compliance and operational risk.

15.2 Planned customer journey

- the interested party enters the official website and provides the data necessary for the order
- reads the white paper and the risk information, accepts the customer information
- declares that they do not belong to the personal scope of the excluded jurisdictions
- provides the wallet address to which the tokens are requested
- receives the confirmation of the order with the amount payable and the payment deadline
- makes the payment from a bank account held in their own name
- the Issuer checks the payment trail and carries out the sanctions screening
- the Issuer sends the tokens to the wallet address provided
- the token holder gains access to the utility system linked to the token

In the case of payment in crypto-assets or the opening of a payment gateway, customer identification and sanctions screening are carried out by a licensed external service provider.

15.3 Custody and token management

The buyer receives the purchased HATX tokens into their own wallet; the Issuer does not hold or manage the tokens of buyers and therefore does not carry out custody activity in this respect. The Issuer manages solely its own holdings, in particular the treasury tokens and the tokens subject to founder and strategic partner lock-up. For the secure management of these own holdings the Issuer may, in a later phase of the project, engage a licensed, institutional-grade custody and token management provider. If the Issuer were in the future to provide any custody type service for the benefit of buyers, it would do so solely with the involvement of a licensed crypto-asset service provider.

16. Roadmap

16.1 First phase: legal and technical foundation

- creation of the Hungarian issuer Kft. (completed)
- legal and compliance review of the classification under MiCA, obtaining a legal opinion (completed)
- finalisation of the white paper
- preparation of the MiCA white paper notification to the MNB
- preparation of the token smart contract
- selection of KYC/AML and payment partners
- preparation of the official website and document library

16.2 Second phase: token launch and community building

- the first community / public access phase of HATX
- making at most 10-15 million HATX actually available in the first 6-12 months
- announcement of the first discount programmes and first partner agreements
- publication of the ecosystem rules
- preparation of the milestone based release of the further community allocation

16.3 Third phase: processing and material manufacturing

- preparation of processing capacities and the supplier system
- natural material based building material development, prototypes, first manufacturing tests
- preparation of the quality assurance system

16.4 Fourth phase: project company condominium models

- preparation of the first project company and development opportunity
- application of the HATX holder discount system
- testing of the pre-booking system and refinement of the project model
- separate preparation of the necessary investment financing sources

16.5 Fifth phase: expansion

- further partners, building materials and project companies

- regional and international market building

The roadmap contains goals and planned directions. It does not constitute a binding promise of results, and the order of the phases may change. International market building means the adaptation of the HATX utility and access model to local legal, financial, construction and partner conditions.

17. Environmental and social impact

17.1 Environmental goal

The goal of the project is to support the spread of natural, healthier and lower environmental impact building materials. Hemp, straw, clay and other natural based building materials, with appropriate development and construction, can contribute to lower construction emissions, a more natural living environment, local raw material use and more sustainable construction solutions.

17.2 Social goal

The social goal of the project is to help the realisation of more affordable, healthier residential buildings. The project does not promise that it can create cheaper homes in every case, but its goal is to develop a business and construction model that can improve affordability in the long run. In this, HATX does not provide an independent housing right, but is a digital coordination instrument that helps the organised connection of interested parties, partners, project companies and communities.

18. Risk factors

18.1 Regulatory risk

The regulation of crypto-assets is complex and may change. Although the goal of the project is to develop a utility token construction, the final legal classification requires legal and, where applicable, regulatory interpretation.

18.2 Utility risk

It may happen that the services, discounts or access linked to the token are delayed, modified or not realised.

18.3 Project risk

Natural raw material processing, building material manufacturing and condominium project development are capital, permit and partner intensive activities. Delays, cost increases, technological problems or market obstacles may occur.

18.4 Technological risk

Errors, attacks or outages of the blockchain, the smart contract, the wallet or the custody system may cause loss or an access problem.

18.5 Market risk

If the HATX token enters secondary market trading, its price may fluctuate significantly, and the token may lose its value in part or in full. A significant change in the price may affect the practical availability of the access levels; therefore the Issuer may review the entitlement levels from time to time in separate rules.

18.6 Liquidity risk

It is not guaranteed that the HATX token will be sellable at any time. Listing on an exchange is not guaranteed and secondary market liquidity is not guaranteed.

18.7 Partner risk

The project may rely on external partners. If a partner drops out, is delayed or does not perform, this may affect the discounts and services linked to the token.

18.8 Real estate project risk

The condominium projects may be realised in separate project companies or cooperatives, with their own permitting, financing, construction and sales risks. The HATX token does not provide an ownership right in these.

18.9 Tax risk

The tax consequences of acquiring, holding, using or selling the token may differ by country and by person. It is the responsibility of each participant to assess their own tax situation.

18.10 International adaptation risk

The legal, tax, construction, financial, crypto-asset and consumer protection rules of individual countries may differ. It is not guaranteed that every utility function will be available on the same conditions in every country.

19. Legal classification of the token and MiCA compliance

HATX is a crypto-asset other than an asset-referenced token or an electronic money token under MiCA. The practical purpose of the token is of a utility nature: it provides access, discounts, priority and ecosystem benefits. The classification of HATX does not depend on whether the individual utilities are provided by the Issuer or by the partners, cooperatives and project companies participating in the ecosystem of the Issuer; the token belongs in every case to the category of other crypto-assets and does not embody a financial instrument, an investment right or an entitlement to a return. The Issuer is responsible for the availability of the utilities within the framework set out in this white paper and in the separate rules, while the token does not confer any claim on the service of any partner, cooperative or project company. The purpose of the token is to provide access to goods, services, discounts and ecosystem benefits.

In the Issuer's view, HATX does not qualify as a financial instrument excluded from the scope of MiCA (in particular as a transferable security under MiFID II), is not an asset-referenced token (ART) and is not an e-money token (EMT), and is furthermore not a deposit and not funds. The token does not embody a participation, return, interest, dividend or claim.

The final legal classification is confirmed by the legal opinion of Dr. Fekete-Szabó Tamás, attorney (Fekete-Szabó Ügyvédi Iroda, bar identification number: 36059992), which is attached to the notification. The date of the legal opinion is 27 August 2026.

Before the public offer or any admission to trading, the Issuer prepares the MiCA crypto-asset white paper and sends it to the competent Hungarian authority, the Magyar Nemzeti Bank, in accordance with the applicable procedure.

The Issuer does not intend to carry out any activity that would in itself require a crypto-asset service provider authorisation, in particular it does not intend to operate its own crypto exchange, its own custody service, its own crypto-asset exchange service or order execution carried out for third parties. The project intends to use such services through external service providers holding authorisations.

20. Legal statements and compliance principles

20.1 Nature of the document

This white paper is an information document. It is not a share issuance prospectus, not a prospectus, not investment advice, not financial advice and not tax advice.

20.2 Communication principle

The communication of the project must be clear, fair and not misleading. It is prohibited to promise a guaranteed return, a guaranteed price increase, a guaranteed buyback or profit sharing. Marketing communication may speak about the growth opportunities of the HATX ecosystem and the advantages of early access, but these may not be communicated as a guaranteed investment return or a price promise. Marketing communication must be consistent with this white paper.

20.3 Equal treatment

The Issuer treats the holders of the token in accordance with transparent rules. If a different discount is linked to certain token quantities, this must be published. Accordingly, the discounted partner and contributor unit price of 0.06 EUR, as well as its conditions (lock-up, eligible group), are published.

20.4 Conflicts of interest

The Issuer strives to identify, manage and, as necessary, disclose any conflicts of interest, in particular if the Issuer, the founders, the project companies or the affiliated undertakings hold HATX tokens.

20.5 Applicable law and competent court

This white paper, the public offer of HATX and the legal relationships linked to the token are governed by Hungarian law, in accordance with Regulation (EU) 2023/1114 (MiCA). The Hungarian courts have jurisdiction over any disputes, without prejudice to the mandatory Union and national consumer protection rules applicable to consumers.

21. Complaints handling and contact

The Issuer maintains a transparent contact and complaints handling system.

Contact detail	Value
Website	https://hempaccessglobal.com
General email	legal@hempaccessglobal.com
Legal / compliance email	legal@hempaccessglobal.com
Phone	+36706794347
Postal address	6781 Domaszék, Béke utca 3.

The Issuer records, examines and answers within a reasonable deadline the complaints received. The detailed complaints handling policy is published on the official website.

22. Mapping of the MiCA mandatory content elements

The table below assigns the content of the white paper to the mandatory content parts under MiCA, to make the legal review and the regulatory notification simpler.

MiCA mandatory part	Relevant section of the white paper
Mandatory statement and warnings	Mandatory statement
Summary	Summary
The offeror / issuer	5. Issuer and corporate structure
The crypto-asset project	1-4., 16. Roadmap
The public offer / admission to trading	11. Details of the offer
The crypto-asset and the rights attached to it	6., 7., 8., 9.
The underlying technology	13. Technological background
Risks	18. Risk factors
Sustainability / energy indicators	14. Sustainability and energy use disclosure

23. Closing summary

The purpose of the Hemp Access Token is to be the digital access instrument of a real, natural material based construction ecosystem. The HATX token is built not on a profit promise but on practical benefits: discounted access to natural based building materials, pre-booking and priority options, discounts linked to project company condominium developments, partner ecosystem benefits and early connection to the developing market of natural construction.

The long-term success of the project is built not on a single promise but on consistent implementation, real utility, partners, market acceptance and the trust of the community.