

## SCN White Paper



*SCN logo*

This white paper summarises the key information about the SCN utility token, checks the grammar and syntax of the drafts, structures the content in a comprehensible manner and supplements it with explanatory graphics. All information is provided to the best of our knowledge and belief; the issuer reserves the right to make changes.

### Legal notice:

The cooperating companies named in the document act exclusively as technical service providers for SCANDIC FINANCE GROUP LIMITED and bear no responsibility for the issuance of SCN.

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### Hyperlink library

For a better overview, the following library contains hyperlinks to the most important sections of this white paper. Use these links to quickly jump to the respective chapters:

- Executive Summary: Overview of the SCN token's objectives and special features, as well as the most important key figures relating to the issue.
- Legal framework: Description of the regulatory environment in Hong Kong, the EU and internationally.

- Token structure and technology: Information on the total amount, token distribution, technical specifications, vesting agreements and security features.
- Ecosystem and partners: Description of the SCANDIC brands, technical service providers and the planned integration of the token into operational business.
- Compliance and governance: Information on integrity, KYC/AML, data protection, ethics, human rights and sustainability policies.
- Risk factors: Presentation of market, regulatory and operational risks.
- Development roadmap: Timeline from current progress to TGE to implementation of new features.
- Advantages of the Scandic Eco-System: Summary of the group's unique selling points, including its own blockchain and integration of real assets.
- Appendix: Full revised text of previous white paper versions.

## Executive Summary

The SCN white paper introduces the utility token of the SCANDIC brand ecosystem. The aim of this token is to connect all of the group's services and offer an integrated payment system for travel, finance, mobility and lifestyle products. **SCN** is a pure utility token; it does not confer any rights to income, dividends or voting rights and is therefore not subject to securities regulation. The maximum token supply is strictly limited, with the issuer having the option to mint or destroy tokens as needed to ensure a stable economy.

**Project overview:** **SCN** is the SCANDIC Group's central utility token and serves as a connecting element within a regulated ecosystem that links real-world services (mobility, finance, real estate, media, technology) with digital applications. Based on the group's 30 years of experience, the token bridges the world of luxury with the Web3 cosmos and addresses growing demand at the intersection of the luxury and crypto markets (annual growth approx. 6.8%).

## Key figures and status:

- **Legacy:** Built on established companies with over 30 years of market experience and global presence.
- **Positioning:** Interface between the luxury market (2024 revenue approx. 390 billion US dollars) and the crypto market (around 659 million users worldwide), giving **SCN** a highly attractive niche.
- **Regulatory focus:** The issuer complies with EU MiCA and Dubai VARA standards to create a regulated financial market; the issue is structured as a utility token and is not subject to securities law.
- **Infrastructure:** Launch of the Scandic Pay Wallet and Scandic Crypto Card for seamless everyday use of the token from the first quarter of 2026.
- **Vesting:** Implemented lock-up agreements for team, advisors and investors prevent market distortions.
- **Investors:** Private/angel financing round of over \$1 million with a minimum investment of \$200,000 in the pre-seed/private phase (negotiable).
- **TGE:** The token generation event is planned for the end of Q4 2025 (December

2025) ; details on valuation and unlock quotas will be published in the prospectus.

The issuer is based in Hong Kong. Under current law in the Special Administrative Region, there is no specific legislation governing utility tokens; instead, general financial and anti-money laundering regulations apply. A licence is only required if a token has the characteristics of a security within the meaning of the Securities and Futures Ordinance (SFO). SCN is expressly designed not to meet these requirements. The legal requirements for stablecoins, which have been regulated by a separate law since August 2025, therefore do not apply to SCN.

This white paper provides a structured overview of the legal basis, token structure and governance-related aspects, as well as risks and future plans. Where appropriate, graphical representations are used to illustrate complex issues. The complete, editorially revised text of the previous drafts can be found in the appendix .

## Introduction

The global market for digital assets is developing rapidly. In addition to stable currencies ("stablecoins"), so-called utility tokens are increasingly appearing, which do not represent payment in the traditional sense, but rather convey access and usage rights within a network. SCN falls into this category. The issue is being carried out to finance and promote an integrated ecosystem of travel, payment and mobility services operating under the brands SCANDIC SEC, SCANDIC FLY, SCANDIC PAY, SCANDIC CARS, SCANDIC DATA and others.

This version has been extensively edited. Spelling, grammar and sentence structure have been corrected; redundant or inconsistent passages have been deleted or summarised. In terms of content, the core message remains unchanged: SCN is an instrumental token for the use of services within the SCANDIC ecosystem. It does not constitute an investment in a security and is not intended for speculation.

## 1 Legal framework for utility tokens

### 1.1 Regulatory environment in Hong Kong

Hong Kong does not yet have a specific legal framework for the issuance of utility tokens. Crypto assets are treated in accordance with existing financial laws. The Securities and Futures Ordinance (SFO) only subjects a token to the strict regime of financial market supervision if it has the characteristics of a security. These include, among other things, the promise of returns, voting rights or participation in company profits. As SCN is designed purely as a utility token, no licensing is required. Nevertheless, the issuer undertakes to comply with anti-money laundering (AML) and know your customer (KYC) regulations.

In 2025, a separate law ("Stablecoins Ordinance") was passed for stablecoins issued in Hong Kong. In particular, this law stipulates a licensing requirement, reserve coverage requirements and disclosure obligations. The present token issue is not subject to this regulation, as **SCN** is not designed to be stable in value and is not linked to any fiat currency.

## 1.2 International standards

The issuer also complies with current standards outside Hong Kong. This includes the Financial Action Task Force (FATF) guidelines on combating money laundering, the European Union's crypto regulation requirements (MiCA) and the recommendations of the International Organisation of Securities Commissions (IOSCO). By voluntarily complying with these standards, the issuer aims to ensure a high level of legal certainty and consumer protection.

## 2 Token structure and technology

### 2.1 Function and benefits of SCN

**SCN** is an Ethereum-based ERC-20 token. It serves as a universal means of payment for all services in the SCANDIC ecosystem. Users can use **SCN** to book services, receive discounts or collect rewards. The token thus promotes customer loyalty and reduces transaction costs.

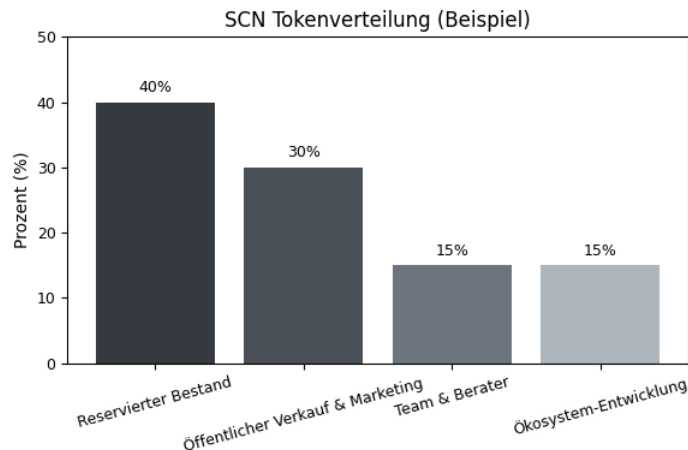
The smart contract specifies a maximum quantity of 1 billion tokens. Only the issuer can mint and burn tokens, which means that the quantity in circulation can be flexibly adjusted without exceeding the maximum quantity. An excerpt from the functions:

- `mint(address to, uint256 amount)`: creates new tokens for authorised addresses.
- `burn(uint256 amount)`: allows holders to voluntarily destroy their tokens.
- `burnFrom(address from, uint256 amount)`: allows the issuer to burn tokens from specific wallets, for example to punish cases of fraud.

Through the implementation of upgrade mechanisms (UUPS standard), the smart contract can be expanded in the future without affecting existing tokens. A governance function that allows token holders to submit proposals and vote is in the planning stage but is not activated at the time of issuance.

### 2.2 Token distribution

The issuer plans to distribute the tokens in a balanced manner to ensure the sustainable development of the ecosystem. The following diagram illustrates an example allocation of the initial token quantity:



### *Token distribution*

Reserved stock (40%): For long-term operation and ensuring ecosystem stability.

Public sale & marketing (30%): To promote broad acceptance of the token and attract new users.

Team & Advisors (15%): To compensate employees and external experts; subject to lock-up periods to stabilise the market.

Ecosystem development (15%): For strategic partnerships, technical development and the financing of new services.

## **2.3 Technical security**

The smart contract was developed based on open-source libraries (OpenZeppelin) and reviewed by independent auditors. Key security features include:

- Prevention of integer overflow/underflow through the use of uint256.
- Access control using onlyOwner modifiers.
- Option to pause in an emergency to ward off attacks.

In addition, transactions are continuously monitored to detect suspicious activity. In the event of any anomalies, the issuer reserves the right to block affected wallets and initiate investigations.

## **2.4 Fee models and upgrades**

The smart contract supports an optional fee model. In version 2 of the utility token, the issuer may charge a fee for minting and transferring tokens. These fees are limited in the configuration: the minting fee may not exceed 10% and the transfer fee may not exceed 5% of the transaction amount. Fee income is paid out to a defined recipient address (feeRecipient).

The fee rates can be adjusted by calling the function `initialiseV2(uint256 _mintingFee, uint256 _transferFee, address _feeRecipient)`. Each adjustment is logged by the events `FeesUpdated` and `FeeRecipientUpdated`. Transactions for which fees are charged also trigger the event `FeeCollected`. Transparency is ensured by the fact that fees are specified in basis points (example: 100 basis points correspond to 1%).

The upgrade system is based on the UUPS proxy standard. This allows smart contract functions to be extended or changed in the future without the existing tokens losing their validity. The upgrade process is protected by access rights (onlyOwner) and requires an external security check.

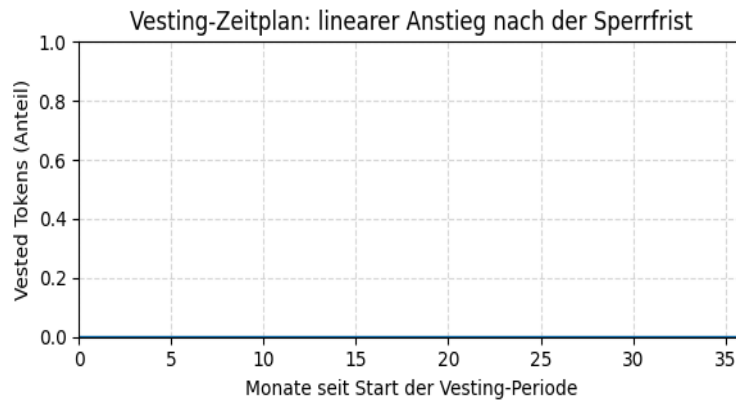
## 2.5 Vesting mechanism and security components

To ensure controlled release of tokens and stabilise market supply, the smart contract includes a **vesting module**. This module sets lock-up periods for certain groups (e.g. team, advisors and long-term partners) before tokens can be issued. The most important parameters of a vesting plan are:

- **Start of the vesting period (startTime):** The point in time at which the lock-up period begins.
- **Cliff period (cliff):** An initial lock-up period during which no tokens are released. Before the cliff period expires, the payable portion is **zero**.
- **Duration (duration):** The total period over which the tokens are released on a linear basis. At the end of this period, 100% of the tokens are available.
- **Revocability (revocable):** Specifies whether the issuer can revoke the plan in the event of compliance violations and reclaim unreleased tokens.

When a vesting plan is created, the relevant tokens are transferred from the issuer's account to the vesting smart contract. The releasable amount is calculated using the `_calculateReleasableAmount` function: before the end of the cliff period, the releasable amount is zero; during the term, the amount increases linearly; after the end of the term, all tokens that have not yet been released are immediately available. Tokens can only be retrieved by the authorised beneficiary using the `release` or `releaseAll` functions. The `ReentrancyGuard` library protects against re-entry attacks; all transfers require the successful completion of the security check (`nonReentrant`). The vesting plan can be revoked by the contract owner (onlyOwner) if defined as revocable; in this case, the tokens that have not yet been created are transferred back to the issuer.

This mechanism ensures that tokens do not enter the market in an uncontrolled manner and that team and advisor remuneration is linked to long-term performance targets. The following diagram illustrates a typical linear vesting schedule with a six-month cliff and a total duration of 36 months:



*Vesting schedule*

Vesting schedule

Vesting schedule

## 2.6 Ecosystem modules and blockchain integration

The technical architecture of SCN is based on the Binance Smart Chain (BSC), an EVM-compatible blockchain with low transaction costs and high processing speed. The smart contract implements several modules that are aligned with the issuer's growth-oriented goals:

- **Staking Module** – allows users to deposit tokens in exchange for a reward. The reward system does not use excessive privileges; it is kept lean and only grants the minimum necessary permissions.
- **Vesting module** – as described above, multiple vesting schedules can be created. Exhausted plans can be replaced with new ones, allowing for flexible management of team and advisor quotas.
- **Bridge module** – enables the transfer of **SCN** between different chains or subsystems. Security features limit the daily minting amount; the relayer can be protected with a multi-signature (multisig). The bridge function thus supports the later switch to a proprietary blockchain without jeopardising the liquidity of the token.
- **Access Control & Upgradeability** – a **timelock** delays administrative changes so that the community can raise objections. The upgrade system follows the UUPS standard, which allows code adjustments without affecting existing tokens.

**Transaction costs on the BSC:** Using the Binance Smart Chain reduces the average fees for common operations such as transfer or approve to a few pence (0.02–0.08 US dollars), stake/unstake operations cost 0.03–0.12 US dollars, and bridge events are 0.04–0.12 US dollars. These low fees increase the token's appeal in everyday use.

## 2.7 Financing and investors

For the early phase of the token issuance, the issuer is planning a private/angel financing round of around \$1 million. The minimum investment amount in the pre-

seed/private phase is \$200,000 (negotiable). Details on the current company valuation and the percentage of tokens that will be released during the token generation event (TGE) will be announced in the official prospectus documents.

## 7 advantages of the Scandic ecosystem

The SCANDIC ecosystem combines real assets, decades of experience and state-of-the-art blockchain technology. Its key unique selling points include:

- **Universal payment – SCN** acts as a universal means of payment for all of the group's offerings. Whether private charters with **Scandic Fly**, yachting via **Scandic Yachts**, real estate transactions via **Scandic Estate** or healthcare services at **Scandic Health**: with the token, users can access all services from a single source without having to manage different currencies or loyalty programmes.
- **Seamless switching between fiat and crypto** – thanks to the close connection to **Scandic Pay** and the planned **Scandic Banking Group**, users can switch between fiat currencies and digital assets at any time. With the Scandic Pay wallet and the Scandic Crypto Card (planned launch in the first quarter of 2026), daily expenses can be paid for with cryptocurrencies, including cashback and bonus programmes.
- **Backed by real assets** – the ecosystem is based on operating subsidiaries with 30 years of market presence and activities in over 30 countries. Revenue from mobility, real estate, finance and media ensures stable cash flows and strengthens the token's value.
- **Proprietary blockchain** – in the medium term, the transition from BSC to a proprietary, regulatory-compliant blockchain is planned. This proprietary infrastructure is designed to ensure high scalability, optimised data protection and interoperability with government digital currencies (CBDCs). The bridge module allows for seamless migration of tokens as soon as the new chain is ready.
- **Strong brand portfolio** – by combining luxury goods, travel and financial services, **SCN** appeals to a high-growth customer group. The luxury goods industry had a volume of around 390 billion US dollars in 2024, while the global number of crypto users reached 659 million. The token thus occupies a market niche between luxury and Web3.

These advantages make **SCN** an innovative bridge between the traditional economy and the Web3 economy.

## 3 Ecosystem and partners

### 3.1 The SCANDIC brand ecosystem

The SCANDIC Group brings together a variety of brands under one umbrella. Its core services include:

- **SCANDIC SEC**: Security solutions for payment systems and digital identities.
- **SCANDIC FLY**: Flight booking and travel platform with its own offers and partnerships.



- **SCANDIC PAY:** Payment service provider for fast, cost-effective transactions.
- **SCANDIC CARS:** Mobility services with a focus on e-mobility and car sharing.
- **SCANDIC DATA:** Analysis and data solutions for optimising the customer experience.
- **SCANDIC YACHTS, SCANDIC HEALTH, SCANDIC ESTATE,** etc.: Special offers in the areas of leisure, health and real estate.

These brands operate under the management of SCANDIC FINANCE GROUP LIMITED and use SCN as their common token. External cooperation partners such as SCANDIC ASSETS FZCO (Dubai), SCANDIC TRUST GROUP LLC (Kyiv) and LEGIER BETEILIGUNGS GMBH (Berlin) provide services in the areas of IT infrastructure, compliance and sales support. However, they are not involved in the token issue and bear no issuer liability.

### 3.2 Organisational chart of the ecosystem

The following diagram illustrates the structure of the SCANDIC ecosystem in simplified form:



Technical service providers (not involved in the issue):

- SCANDIC ASSETS FZCO, Dubai
- SCANDIC TRUST GROUP LLC, Kyiv
- LEGIER BETEILIGUNGS GMBH, Berlin

## 4 Compliance and governance

### 4.1 Compliance framework

The issuer has developed a comprehensive compliance framework covering all areas of business operations. The main focus is on:

- **AML/KYC:** Strict identity verification and ongoing monitoring of transactions to prevent money laundering and terrorist financing.
- **Data protection:** Compliance with international data protection standards, including the European GDPR, when processing personal data.
- **Supply chain and sustainability:** Ensuring fair working conditions and supply chains that comply with human rights within all business units.
- **Business ethics:** Commitment to integrity, transparency and the avoidance of conflicts of interest.

- **Guidelines for vulnerable customers:** Special protective measures for individuals who are considered vulnerable due to their age, health or other circumstances.

## 4.2 Ethics and artificial intelligence

The use of artificial intelligence (AI) plays an important role in the SCANDIC Group, particularly in risk analysis and personalised customer communication. A dedicated AI code of ethics defines core values such as fairness, non-discrimination, transparency and human oversight. AI systems are reviewed before deployment and regularly tested for undesirable biases. Generative AI applications are subject to special labelling requirements so that users can always recognise when content has been created automatically.

## 4.3 Governance structure

The issuer maintains a multi-level governance system. A supervisory board monitors compliance with legal requirements and company guidelines. A compliance committee reports directly to management and reviews internal processes. External audits (e.g. by auditors and security auditors) supplement internal controls.

## 4.4 Terms of use

The use of SCN is subject to binding terms of use. These regulate in particular the permissible uses of the token, disclaimers and the rights and obligations of users. SCN is an intangible digital asset; it is not legal tender and cannot be exchanged back into fiat currency. The issuer does not guarantee that SCN will be tradable at all times or that it will retain a specific value. Users are obliged to comply with all relevant legal provisions of their home country when purchasing and using the tokens and may not use SCN for illegal purposes. Violations of the terms of use may result in exclusion from the ecosystem.

## 4.5 Human rights policy and sustainability

The SCANDIC Group is committed to international human rights standards, in particular the United Nations Guiding Principles on Business and Human Rights. The human rights policy stipulates that forced labour, child labour and discrimination are strictly prohibited in all parts of the company and supply chains. Suppliers must demonstrate that they comply with minimum social and environmental standards. The Group undertakes to assess the potential impact of its actions on human rights and to take appropriate remedial measures. In the long term, all business processes are to be designed in such a way as to minimise environmental impact and guarantee fair working conditions.

## 4.6 Career policy

The career policy describes the principles of human resources policy. It ensures equal opportunities, diversity and inclusion. Application procedures are transparent and non-discriminatory; employees are selected and promoted on the basis of their qualifications, performance and integrity. In addition, the Group promotes continuous training, family-friendly working conditions and a healthy working environment. Violations of the

principles of equal treatment are investigated and may result in consequences under labour law.

#### **4.7 Data protection and cookie policy**

The privacy policy describes how personal data is processed within the SCANDIC ecosystem. The data collected includes contact details, usage and payment information, and technical data (e.g. IP address). Data processing is carried out exclusively for legitimate purposes, such as contract processing, fraud prevention or service improvement. Data subjects have the right to access, rectify, erase and restrict the processing of their data. Cookies are collected and used on the Group's websites for operational, security and user behaviour analysis purposes. Users can restrict or prevent the storage of cookies via their browser settings; however, this may impair the functionality of the services.

#### **4.8 Company profile**

SCANDIC FINANCE GROUP LIMITED was founded with the aim of combining innovative services in the areas of travel, financial technology, mobility and lifestyle. As a holding company, it coordinates the activities of the various brands in the SCANDIC ecosystem and provides central functions such as financing, IT infrastructure, compliance and marketing. The group works with specialised, legally independent partner companies to leverage local market knowledge and meet regulatory requirements in different jurisdictions. Cooperation with these companies does not release the issuer from its overall responsibility; rather, it ensures the smooth operation of a global service network.

#### **4.9 Audit and external review**

The trustworthiness of a utility token depends largely on the quality of its technical and organisational implementation. SCN therefore subjects all relevant smart contracts to an external security audit before they go live. Independent specialist companies analyse the source code, test edge cases and simulate potential attacks. Only after all identified vulnerabilities have been eliminated and the audit reports have been published are the contracts made available on the blockchain. In addition, the contracts are published as open source and can be verified on the respective blockchain explorer. The vesting contract uses standard libraries from OpenZeppelin and is designed in such a way that revocable rights are clearly defined and do not allow unauthorised access.

This white paper is also subject to a multi-stage review process. Internal compliance specialists check the consistency of the information with applicable law (including MiCA, data protection and tax law). In addition, an independent auditor conducts an editorial and legal review and certifies that the statements are consistent with the implemented smart contracts and company guidelines. In particular, this auditor confirms that the information on the legal framework, token structure, vesting and risk warnings is complete and comprehensible. Regular monitoring and continuous improvement of compliance programmes – including internal audits, external certifications and risk reports – ensure that new regulatory requirements or security risks are identified and addressed in a timely manner.

The combination of external smart contract auditing, internal compliance controls and independently audited reporting ensures a high standard of security for SCN. Investors and users can rest assured that the token system is up to date, both technically and legally.

## **5 Risk factors**

**Legal notice:** Participation in token projects involves risks. The following sections list significant risks, but do not claim to be exhaustive.

### **5.1 Regulatory risks**

The legal situation for digital assets is subject to rapid change worldwide. Although SCN is not currently considered a financial instrument under Hong Kong law, future legislation may impose stricter requirements. Changes in international tax or money laundering laws may affect the use of the token.

### **5.2 Technological risks**

The token is based on a publicly accessible blockchain. Potential vulnerabilities in the software, attacks on smart contracts or errors in implementation could lead to losses. Despite audits, there is no complete security. Furthermore, network congestion and delays in transactions may occur.

### **5.3 Market risks**

The value of SCN is not backed by real assets and may be subject to fluctuations. Demand and supply are heavily dependent on the acceptance of the ecosystem. There may be periods of low liquidity during which sales are only possible at significant discounts.

### **5.4 Fraud and cyber risks**

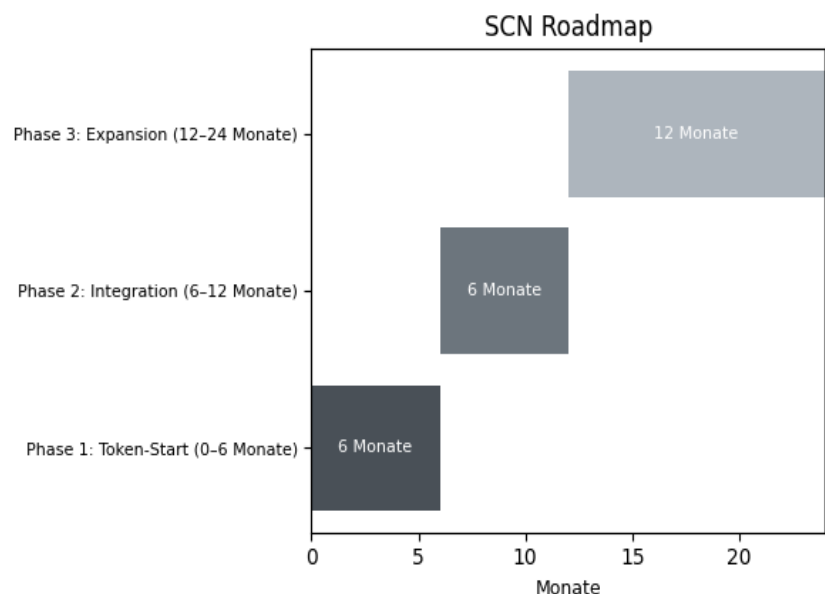
Phishing attempts, fraudulent websites or fake wallet apps can lead to the loss of tokens. Users should only use official information channels and never disclose their private keys.

### **5.5 Operational risks**

Faulty organisational processes, staff turnover or external factors (e.g. natural disasters, political unrest) can impair the issuer's business operations and thus also jeopardise the token's infrastructure.

## **6 Development roadmap**

The issuer plans to implement the SCN strategy in stages. The following schedule describes the most important milestones:



## Roadmap

**Phase 1 (until the end of Q4 2025) – *Initialisation and TGE*:** Completion of pre-seed and private financing, deployment of the smart contract on the BSC testnet, internal security tests, establishment of KYC/AML processes and preparation of token distribution. The Token Generation Event (TGE) is scheduled for the end of the fourth quarter of 2025 (December 2025).

**Phase 2 (Q1 2026 – Q3 2026) – *Market launch and integration*:** Listing of the token on selected platforms, official market launch of Scandic Pay Wallet and Scandic Crypto Card (planned for the first quarter of 2026). Integration of SCN into services such as flights, yachting, real estate and health. Expansion of the staking module and launch of reward programmes.

**Phase 3 (Q4 2026 and beyond) – *Proprietary blockchain and governance*:** Migration to the proprietary Scandic blockchain using a bridge module, introduction of on-chain governance, connection to central bank digital currencies (CBDCs) and expansion into new markets.

**Current progress:** Approximately 55–60% of the overall project has already been completed. Remaining tasks include securing the bridge relay (e.g. setting up a multisig wallet), final deployment scripts for the mainnet, setting up governance structures, comprehensive internal testing and detailed documentation.

## Conclusion

SCN is designed as a utility token that provides access to a variety of services within the SCANDIC ecosystem. The token does not entitle the holder to any share in the company's profits and therefore does not fall under the definition of a security under Hong Kong law. A clear governance structure, comprehensive compliance mechanisms and a carefully planned rollout are intended to strengthen the trust of users, investors

and authorities. At the same time, the issuer expressly points out the existing risks and recommends careful consideration before purchasing or using the token.

### **SCN (SCN) White Paper**

Utility token in the SCANDIC ECO-SYSTEM

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#### **Legal notice:**

SCANDIC ASSETS FZCO, LEGIER Limited Liability Company and SCANDIC TRUST

GROUP LLC act as non-operational service providers. All operational and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

**SCN (SCN) is a utility token of the SCANDIC GROUP, designed as a link in an extensive, regulated ecosystem of digital and real economy services. The token primarily serves as a means of access and payment within the group's various business areas – from cloud services to FinTech and media to real estate and exclusive mobility services. SCN is backed by established companies with over 30 years of market experience that operate a scalable and trustworthy network.**

This white paper provides a comprehensive overview of the technical, legal and economic framework of SCN. It explains the issuer's group structure and corporate governance, tokenomics (e.g. total supply, distribution, liquidity pool, vesting), specific use cases for the token in the SCANDIC ecosystem, the technical infrastructure (blockchain platform, smart contracts, data centres) and a market analysis of the relevant industries. Particular emphasis is placed on regulatory aspects: the EU crypto regulation MiCA and its application to SCN, the VARA regime in Dubai and its non-applicability, and the status of crypto regulation in Ukraine.

In addition, compliance and data protection measures are explained in detail – including KYC/AML processes, GDPR implementation and internal guidelines – as well as the corporate ethical guidelines on AI ethics, human rights, supply chain and sustainability. A separate chapter is devoted to investor protection, in particular transparency regarding total loss risks and addiction prevention when investing in digital assets. Finally, the white paper contains a roadmap to 2027 outlining the planned milestones of the SCN initiative, as well as an appendix with a glossary and imprint.

SCN presents itself as a sustainable, legally compliant and future-oriented utility token designed for long-term value creation rather than short-term speculation. This document meets the requirements of a crypto-asset white paper in accordance with MiCA and underlines the SCANDIC GROUP's commitment to adhering to the highest standards of regulation and governance.

## **Introduction**

The ongoing digitalisation and tokenisation of the economy are opening up new opportunities to make value creation networks more efficient and integrated. Against this backdrop, SCANDIC GROUP is launching SCN (SCN) as a utility token to connect and innovatively monetise its broad portfolio of services. SCN is intended to serve as a common currency within the SCANDIC ecosystem, thereby creating synergies between the business areas.

The SCANDIC GROUP is an internationally active association with business areas in the fields of cloud computing & data centres, financial and payment solutions, real estate development, exclusive mobility services (private jets & yachts), security and consulting services, health services, and media & publishing. Despite this diversity, all areas share a central goal: to provide premium services for discerning customers, connected by a common digital infrastructure. SCN acts as a link and transaction medium that facilitates access to these services and increases customer loyalty. The token is not an object of



speculation, but a usage and access token that offers functional added value (e.g. faster transactions, discounts, exclusive access) and optimises the internal value chain.

This introduction first outlines the motivation and context of the project. The following chapters delve deeper into the individual aspects: First, the issuer's corporate structure and management are presented to demonstrate the trust framework behind the token. This is followed by an analysis of the legal framework – in particular the new EU regulations of the MiCA Regulation, which standardises a large part of the regulatory requirements for crypto projects. A technical chapter explains SCN's blockchain platform and security mechanisms. This is followed by economic considerations – tokenomics and market analysis – to demonstrate the sustainability of the token ecosystem.

A central concern of this white paper is also to present the numerous protection mechanisms for investors. These include risk warnings, compliance measures, ethical guidelines (e.g. in dealing with AI or supply chains) and sustainability initiatives. SCANDIC COIN is not only intended to comply with applicable law, but also to proactively implement industry best practices and set new standards in terms of transparency, security and responsibility.

The introduction concludes with an overview of the structure and content of this white paper. Readers are advised to first read the executive summary to get an overview and then study the detailed chapters according to their areas of interest. The roadmap at the end provides a timeline outlook until 2027, while the appendix contains a glossary of important terms and the imprint.

## **Group structure & governance**

The SCN initiative is supported by the SCANDIC GROUP, an internationally positioned group of companies with a clearly defined holding and operating structure. The responsible provider of the token and operator of the platform is SCANDIC TRUST GROUP LLC, based in Kyiv, Ukraine. SCANDIC TRUST GROUP LLC acts as the main operating company, providing all services related to SCN. The rights to the brand and technology are held by SCANDIC ASSETS FZCO in Dubai (UAE), which serves as the holding company and owner of the brands. In Germany, there is also a cooperation partner in the form of LEGIER Beteiligungs mbH (Berlin). SCANDIC ASSETS FZCO and LEGIER Beteiligungs mbH themselves act solely as non-operational service providers and do not perform any operational activities.

**Organisational structure:** This structure ensures a clear separation between strategic management (SCANDIC ASSETS FZCO as holding company), operational implementation (SCANDIC TRUST GROUP LLC as service provider) and regional presence (LEGIER mbH in the EU). This separation is essential for investors and supervisory authorities, as it clearly assigns responsibilities and isolates risks (e.g. different regulatory requirements in different jurisdictions). The following organisational chart illustrates the group structure and the roles of the respective entities (holding company, operating company, partners): Organisational chart of the SCANDIC GROUP – illustration of the holding company and partner structure.



**Corporate governance:** The SCANDIC GROUP is committed to high standards of corporate governance and has established binding governance principles across the group. The key guidelines include:

**Transparency & disclosure:** All material information about the company, its ownership structure and responsibilities is communicated openly (e.g. publication of shareholdings, regular reports).

**Compliance management:** Internal guidelines and control systems ensure that all legal requirements are met. To this end, there is a comprehensive compliance management system, which is described in detail in the chapter on compliance and data protection.

**Stakeholder involvement:** Important decisions are made with the involvement of stakeholders (customers, investors, employees, partners). The Group maintains an active dialogue with all stakeholders in order to take their interests into account.

**Risk management:** Potential financial, operational and legal risks are systematically identified and assessed. Internal control mechanisms (audits, contingency plans, etc.) are in place to proactively manage risks.

The group structure is complemented by a number of brands/business areas that form the SCANDIC ecosystem. Each brand is an independent entity with a specific focus, but the holding company strategically orchestrates their activities. The most important brands (with their logos) and their functions are briefly presented below:

**Scandic Data:** Operator of sustainable cloud and data centre services that are essential for hosting the group's own platforms (including SCANDIC COIN infrastructure).

**Scandic Trust:** The group's treasury platform, responsible for managing the utility token (issuance management, smart contracts) and processing the liquidity pool.

**Scandic Pay:** The group's payment system and e-wallet solution, which enables fast transactions in SCN. SCN will be usable as a means of payment here.

**Scandic Estate:** Division for real estate projects and investments (primarily hotels and commercial properties). Here, SCN can serve as a digital investment and transaction medium (e.g. for tokenising real estate shares or community investments).

**Scandic Fly:** Provider of aviation and drone services, including private jet charter, ambulance flights and logistics. SCN is used as the booking and billing currency for these exclusive mobility services.

**Scandic Yachts:** Platform for yacht sharing and chartering, offering exclusive experiences on luxury yachts. SCN serves as the booking currency and loyalty token for customers of these services.

**Scandic Trade:** Trading and marketplace platform for selected goods and services (e.g. precious metals, emission certificates, luxury goods). SCN can be used as a medium of exchange on the marketplace to process transactions faster and with lower fees.

**Scandic SEC:** Unit for security services and management consulting (physical and digital). Here, SCN stands for access to security services and, if necessary, as a means of payment for recurring security services.

**Scandic Health:** Health and lifestyle services (e.g. telemedicine, prevention programmes). SCN could potentially facilitate access to health platforms or be used in bonus programmes.

The use of uniform logos and the introduction of SCANDIC COIN as a connecting element clearly show how diverse the SCANDIC GROUP's business model is – and how SCANDIC COIN integrates this diversity into a holistic ecosystem. Strict adherence to corporate governance principles and transparent disclosure of the group structure form the basis of trust for investors: they know which company is behind the token, how the company is managed and what values (transparency, compliance, sustainability) guide it.

### **EU regulation (MiCA):**

The Markets in Crypto-Assets Regulation (MiCA) – Regulation (EU) 2023/1114 of 31 May 2023 – creates the first EU-wide uniform legal framework for crypto assets. MiCA applies to all crypto assets that are not already covered by existing financial market laws (such as MiFID II), in particular utility tokens, asset-referenced tokens (ART) and e-money tokens (EMT). For utility tokens such as SCN, MiCA requires that a crypto asset white paper be prepared and published, containing certain minimum information (including information on the issuer, tokenomics, risks). Unlike a securities prospectus, however, a MiCA white paper does not have to be approved by the supervisory authority and is more flexible in format – its primary purpose is to ensure transparency for the public. SCANDIC COIN meets these requirements with this white paper, which provides all relevant disclosures in accordance with Art. 6 MiCA.

An important feature of MiCA is its extraterritorial effect. In principle, providers from third countries (outside the EU) may also offer crypto services to EU customers – but only if these services are provided at the instigation of the customers (so-called reverse solicitation). Article 61 MiCA clarifies that no licence from an EU Member State is required if a service provider from abroad does not actively solicit EU customers, but the business relationship is established solely on the initiative of the customer. This reverse solicitation exemption is important for the SCANDIC GROUP, as the operating entity is based in Ukraine. SCANDIC COIN is not actively marketed to the general EU public, but is primarily aimed at professional users and existing customers who express interest on their own initiative – this means that no EU licence as a crypto service provider is required. Nevertheless, SCANDIC complies with the transparency and information requirements of MiCA and reports the white paper to the competent supervisory authority. MiCA provides for staggered implementation deadlines (for stablecoins from June 2024, for other crypto assets from December 2024); SCANDIC has taken the necessary precautions at an early stage to be fully compliant as soon as the regulation comes into force. While any stricter rules for "significant" tokens (very large reach) do not apply to SCN due to a lack of corresponding volume, the company is continuously monitoring regulatory developments.

Distinction from other regimes: Beyond the EU, other relevant legal systems were examined in order to comprehensively cover regulatory risks. The regulations in the United Arab Emirates (UAE) and Ukraine are particularly relevant, as this is where the SCANDIC entities are based, as are international standards such as the FATF recommendations on money laundering prevention. The US Howey Test was also analysed to ensure that SCN is not classified as a security (SCN does not offer any claim to profits and should therefore not be considered an "investment contract" in the US). In the United Kingdom, utility tokens are considered "unregulated tokens", meaning that no licensing is required there. Switzerland allows the issuance of "usage-based tokens" (utility tokens) without a financial market licence, provided that they are not used for payment purposes. These international aspects demonstrate that SCN is positioned in a global context as a pure utility token that is not subject to either securities regulations or e-money regulations – an important criterion for freedom in cross-border distribution.

#### **Dubai/UAE (VARA regime):**

In Dubai, a separate regulatory framework was created with the Virtual Assets Regulation Law (VAL), Law No. 4/2022. It established the Virtual Assets Regulatory Authority (VARA) as the supervisory authority, which has issued detailed rulebooks for crypto activities since 2023. VARA requires that all virtual asset activities in Dubai (such as exchange operations, custody, brokerage, consulting, etc.) require prior licensing or registration with VARA. However, the VARA regime is territorially limited: it applies within the Emirate of Dubai (including free zones, excluding DIFC) and does not generally cover foreign companies as long as they do not operate in Dubai. VARA does not have general extraterritorial applicability, as is the case with MiCA; foreign providers only have to comply with VARA if they are actually active in the emirate. For SCN, this means that although the holding company SCANDIC ASSETS FZCO is based in Dubai, it does not conduct any operational business there (all token-related activities are carried out by the Ukrainian entity). Therefore, the VARA law does not trigger any licensing requirements; SCANDIC GROUP is primarily subject to EU MiCA (as a reference framework) and Ukrainian regulations. VARA-specific obligations – such as strict advertising regulations with warning notices – are not relevant for SCANDIC in Dubai. Nevertheless, SCANDIC has designed its marketing and compliance standards to be consistent with the best practices of both MiCA and VARA. For example, advertising materials do not make any guarantees of value appreciation and always include a risk warning about volatility and the risk of total loss. SCANDIC thus voluntarily complies with the highest standards of both regimes, even though only MiCA is formally applicable.

**Ukraine:** In 2021/2022, Ukraine passed a law "On Virtual Assets" (No. 2074-IX), which was intended to create a legal framework for the circulation of crypto assets. However, this law has not yet come into force, as the necessary changes to tax law have not yet been implemented. Specifically, Law No. 2074-IX will only come into force when a separate tax law on the taxation of crypto transactions comes into force – and such a tax law has not yet been passed. In practical terms, this means that there is currently no active licensing requirement for the issuance or trading of virtual assets in Ukraine. Legal conclusion: SCANDIC TRUST GROUP LLC therefore does not currently require national approval to issue the SCN. The planned issuance of a pure utility token in a closed ecosystem – without its own trading platform and without a value proposition –

would not require a licence even under a future Ukrainian regime, provided that the token only grants access to services. Nevertheless, SCANDIC is actively monitoring regulatory developments: Ukraine has adapted its crypto law to MiCA. SCANDIC GROUP has established appropriate monitoring processes and will seek further approvals and take compliance measures in the future as soon as additional national regulations come into force.

### **Summary of the legal situation:**

From today's perspective, there are no significant obstacles to the issuance of SCN. The comprehensive legal review revealed: (1) SCN is classified as a utility token and is therefore neither a security nor e-money – there is no prospectus requirement, and the MiCA white paper requirement is fulfilled by this document. (2) A VARA licence is not required as no business activity is carried out in Dubai. (3) Ukrainian law does not currently require a licence; future changes are anticipated and will be complied with. (4) There are no obvious regulatory arbitrage risks internationally, as SCN is classified as non-regulatory (utility token without a promise of return) even according to SEC (US) and FCA (UK) standards.

SCANDIC GROUP also emphasises that it voluntarily meets the highest compliance standards, even though SCN is unregulated in certain jurisdictions. For example, this comprehensive white paper was created even though SCN is exempt from the obligation as a "limited network token" within the meaning of EU law – simply to ensure maximum transparency. The marketing strategy is also handled conservatively (no sensational promises, documentation of customer contact for the purpose of proving customer initiative in the sense of reverse solicitation). SCANDIC GROUP is thus proactively demonstrating that it is behaving responsibly in the grey area before new laws come into force and exemplifying the compliance culture of a regulated financial institution.

Comparison of regulatory regimes – comparison of requirements under EU MiCA, VARA (Dubai), Ukrainian and Hong Kong law.

### **Tokenomics**

This section describes the technical and economic characteristics of the SCN (SCN), including total supply, allocation, issuance, liquidity management, vesting rules and use of proceeds from sales. The aim is to present the value structure and incentive mechanisms in a transparent manner.

**Total supply and distribution:** The SCN is designed as a fungible ERC-20-compatible utility token (or comparable standard on the selected blockchain). The maximum token supply is 1 billion SCN (fictitious example for planning purposes). A fixed upper limit is intended to signal scarcity and avoid inflationary dilution. The tokens will be generated once (Token Generation Event, TGE) and then distributed as follows (example distribution, Figure 3):

**Private & Public Sale (~50%):** Approximately half of the total supply is reserved for early supporters, strategic partners and public offerings (e.g. seed sale, public ICO/IEO). These tokens are used to raise capital for project financing and are issued in several phases (see pricing below).

**Ecosystem & Community (~20%):** Around one-fifth goes into an ecosystem fund for future developments, partner incentives, bug bounties, community rewards and staking rewards. This ensures that sufficient tokens are available for the further development of the network and user retention.

**Team & Advisors (~15%):** Approximately 15% is earmarked for the founding team, employee stock ownership plans (ESOP) and advisors. These tokens are subject to strict vesting conditions (see below) to provide long-term incentives and prevent sudden sell-offs.

**Reserve & Liquidity (~15%):** The remaining approx. 15% will be retained as a reserve or allocated to liquidity management. This includes the initial liquidity pool for trading venues and, if necessary, treasury reserves to respond to unforeseen market conditions.

Token distribution (SCN) – Diagram illustrating the percentage distribution among the categories mentioned.

**Liquidity pool and market liquidity:** To ensure stable trading of SCN and avoid excessive price fluctuations in the initial phase, SCANDIC GROUP is providing an initial liquidity pool. This capital is contributed in the form of stablecoins (euro-pegged tokens) and deposited together with an equivalent amount of SCN tokens in an automated market maker (AMM) pool (e.g. on Uniswap). The pool's smart contract is open source and the pool addresses and transactions are publicly visible, which complies with MiCA transparency requirements. The core features of the liquidity pool are:

**Purpose:** To ensure sufficient liquidity in the secondary market, reduce spreads and slippage for traders, and build trust in price formation.

**Lock-up period:** The liquidity provided by SCANDIC is locked for at least 12 months after listing (liquidity lock) to prevent early withdrawal of liquidity and thus protect investors.

**Expansion by third parties:** After the lock-up period has expired, external liquidity providers can also contribute capital to the pool and earn a share of the trading fees. This supports the decentralisation of liquidity supply.

**Transparency & governance:** Changes to the pool (e.g. parameters) are subject to protocol governance or, in the case of a company-owned pool, are communicated in advance.

**Vesting plan:** To avoid dumping and unfair start-up advantages, the allocated team and advisor tokens are subject to a clear vesting schedule:

There is a cliff period of 6 months from the token generation event (i.e. no team/advisor tokens are released in the first 6 months after TGE).

This is followed by a linear release over 24 months (monthly or quarterly), so that the tokens become available evenly over two years.

For the founders of the company, there is also a voluntary lock-up period of 12 months beyond the aforementioned vesting period. In practice, founder tokens are therefore only accessible 18 months after the TGE – and then only gradually.



If employee tokens are allocated via ESOP, comparable lock-up periods apply in order to promote long-term loyalty to the company.

This security vesting mechanism ensures that key individuals have a long-term interest in the success of the project and avoids early peaks in selling pressure. All vesting agreements are mapped in smart contracts and made publicly available (transparent vesting schedules).

**Pricing and use of proceeds:** The issue price of SCN will increase gradually in different phases to reward early investors while raising sufficient funds for the project. The plan is to have a sequence of, for example: seed sale (low price, limited volume, strategic partners), public sale (IDO/IEO, higher price) and later listing on exchanges (market-based pricing). The specific prices will be determined based on the market and project phase. The funds raised from the token sale will be used strictly for the further development of the project. The following use of proceeds is planned (example breakdown):

**Development (40%)** – Investments in technological infrastructure: expansion of green data centres, development of new platform features, improvement of IT security, audits of smart contracts, etc. This ensures that SCN remains technically scalable and secure.

**Liquidity pool (25%)** – Financing of the initial liquidity pool with €250,000 (as described above).

**Marketing (15%)** – Global marketing campaigns, investor and customer relations, community building, educational initiatives (workshops, webinars). This is intended to raise awareness of SCN and establish a strong ecosystem of users and supporters.

**Operations & personnel (10%)** – Covering ongoing operating costs, salaries and personnel expansion (especially in the areas of customer service, technology and compliance).

**Legal & compliance (10%)** – Legal advice, ongoing audits, costs for regulatory filings, any licence fees (if required in the future) and the implementation of regulatory obligations.

This careful allocation ensures that funds are used in a way that guarantees the sustainable development of the project. A significant portion of the expenditure is expressly reserved for compliance and risk management – an important signal to investors that SCANDIC is proactively complying with regulatory obligations.

Overall, SCN's tokenomics are designed to balance stability, fairness and growth. The strict limitation of supply, long-term vesting mechanisms and reserved liquidity protect against speculative volatility and build trust. At the same time, the use of proceeds in core areas (technology, marketing, compliance) enables the growth of the ecosystem, which in turn should increase the utility and demand for the token. The interplay of these factors – transparent token distribution, prudent liquidity and risk management, sensible use of funds – lays a solid foundation for the long-term success of SCN.

## **Use cases**

SCN derives its value from specific use cases within the diverse SCANDIC ecosystem. As a utility token, SCN is designed to serve as a common transaction medium and access authorisation across the group's various platforms and services. The following section outlines the most important use cases, showing how SCANDIC COIN can be used in practice and how this benefits token holders and the company:

**Payment for cloud and IT services (Scandic Data):** Customers of SCANDIC Data data centres can use SCN to pay for cloud services, server capacity or storage space. Potential benefit: Payments in SCN could be rewarded with discounts or prioritisation (e.g. preferential support) to incentivise the use of the token. As the data centres are committed to green IT, SCN enables users to directly promote sustainable digitalisation.

**Payment transactions (Scandic Pay):** Companies can use the SCANDIC Pay e-wallet to make payments in SCN to each other or to end users. SCN acts as a fast bridge currency for real-time transactions without the friction losses of traditional banking channels. One use case is the transfer of micropayments for digital content: SCN can minimise transaction fees, making new business models (pay-per-use, paywall micropayments) economically viable.

**Financing & investments (Scandic Trust & Scandic Estate):** SCN opens up new avenues for corporate financing. For example, SCANDIC plans to partially finance certain projects (e.g. real estate development via Scandic Estate) using tokens. Investors could use SCN to acquire digital shares in projects or participate in proceeds through staking. By linking to Scandic Trust, treasury functions (interest payments, profit distributions in the form of tokens) can be handled efficiently.

**Exclusive mobility & experiences (Scandic Fly & Scandic Yachts):** In the areas of private jet and yacht charter, SCN serves as a booking and billing unit for high-priced services. Token holders could, for example, book a flight with SCANDIC COIN via a platform – this reduces processing times and currency exchange costs for international customers. At the same time, SCN can be integrated into loyalty programmes: frequent users of these services receive rewards in SCN or discounts on future bookings, which strengthens customer loyalty.

**Trading platform (Scandic Trade):** On the planned marketplace for physical and digital goods, SCN acts as a universal medium of exchange. Companies can offer goods (such as precious metals or CO<sub>2</sub> certificates) for sale in exchange for SCN. Smart contracts ensure fiduciary processing (goods versus tokens). SCN thus enables fast, borderless processing of commercial transactions. Automated marketplaces for specific assets are also conceivable, with SCN serving as the base pair and thereby generating additional demand for the token.

**Security & Identity (Scandic SEC):** In sensitive areas of security and identity verification, SCANDIC COIN can be used as an access token. For example, a SCANDIC COIN token (or an NFT derivative thereof) could represent temporary access authorisations to protected facilities – as part of an IoT/access control solution from Scandic SEC. Furthermore, customers could use SCANDIC COIN to book audit services or penetration tests, with the token transfer also serving as a transparent log for the order placement.

**Health and lifestyle services (Scandic Health):** In the healthcare segment, SCN could be integrated into prevention programmes, e.g. as a reward for achieving health goals (tokenised wellness rewards). Insurance companies or employers could award SCN as an incentive to customers/employees who participate in telemedicine programmes or take certain steps to maintain their health. This would give SCN a social benefit that goes beyond purely financial transactions.

**Media & Entertainment (LEGIER Media):** The SCANDIC GROUP operates a network of 115 international daily newspapers and magazines through its partner LEGIER. SCN is used here as a payment token for digital content. In a media platform app, users can unlock exclusive articles via SCANDIC COIN micropayments, which causes less friction than traditional subscription models and establishes SCN as a media currency. This broad media presence makes it easier to reach potential token users and increases brand awareness.

The connecting element of all use cases is that SCN creates added value within a closed ecosystem. Activities in one area potentially increase the benefits of another area, creating synergy effects and a basic demand for the token. For example, a customer travelling with Scandic Fly can invest in real estate via Scandic Estate or make transactions with Scandic Pay – in all cases, they use SCN. This principle means that the demand for and usefulness of the token increase organically with each additional service that is integrated into the ecosystem. SCN thus forms the heart of a comprehensive, regulated ecosystem and bridges the gap between the digital and real economies. Unlike speculative individual projects, SCN focuses on the integration of several exclusive services, creating long-term stability and diversification. Investors benefit from the fact that the token gains intrinsic value through a variety of use cases and is less susceptible to purely external market speculation.

In summary, SCN is embedded in almost all business areas of the SCANDIC GROUP. Each use case has been carefully designed to generate practical benefits for token holders and added value for the group. This broad spectrum of applications – coupled with a discerning customer base – is intended to ensure that SCN experiences sustained demand and acts as a universal "lubricant" for the SCANDIC ecosystem.

## **Infrastructure & Technology**

The technical implementation of SCN is focused on security, efficiency and scalability. SCN is based on a modern, energy-efficient public blockchain infrastructure, supplemented by the SCANDIC GROUP's own IT infrastructure. The most important components and architectural decisions are explained below:

**Blockchain protocol:** SCN is issued on a Layer 1 blockchain with a Proof-of-Stake (PoS) consensus mechanism. This platform (e.g. Ethereum 2.0, Solana or a comparable PoS chain) offers high security and decentralisation with comparatively low energy consumption. PoS enables fast transaction confirmations and high scalability (high-throughput networks), which is essential for the intended use cases (micropayments, IoT transactions, etc.). In addition, a PoS system conserves resources and is in line with the SCANDIC GROUP's sustainability goals (see Sustainability chapter).



Smart contracts: SCN is issued and controlled via smart contracts that implement audited and transparent rules. Important smart contracts are:

the token contract (ERC-20-compatible) for managing supply, transfers and, if necessary, modular functions (e.g. upgradability, pausability for emergencies),

the vesting contract, which automates the time-delayed release of team and advisor tokens in accordance with the vesting plan,

the liquidity pool contract (AMM), which enables the provision of liquidity and swapping between SCN and other tokens (e.g. stablecoins),

additional mechanism contracts for rewards (staking/yield farming) or governance (if community votes on parameters are planned in the future). All smart contracts are externally audited and the code is published as open source to ensure maximum transparency. The smart contracts contain security mechanisms such as multi-signature management for critical functions (e.g. the minting of new tokens after TGE is blocked or requires multiple signatures).

Off-chain infrastructure: A unique feature of SCANDIC is the integration of its own high-performance data centres (green data centres) into the token infrastructure. SCANDIC DATA operates data centres 24/7, which serve as an off-chain backbone for certain applications. For example, the group's service platforms (cloud services, media platform) that integrate SCN as a payment layer run on these data centres. The proximity of token services to the company's own IT infrastructure enables low latency and high availability. Critical services are secured by geo-redundancy and backup data centres to guarantee reliability. The data centres are powered by renewable energy and use AI optimisation for load forecasting (see AI ethics), making them particularly energy-efficient.

Oracles: Oracles are used to ensure the smooth running of some smart contracts, providing trusted real-time data from outside the blockchain. For example, price oracles for exchange rates (EUR/SCN or other crypto prices) may be necessary to ensure a stable exchange value or to calculate limits/risk thresholds in euros. SCANDIC relies on decentralised oracle networks (such as Chainlink) or operates its own oracle nodes in data centres that provide multi-signed data feeds. Oracles are also audited regularly, as they can be a potential point of attack (man-in-the-middle for price data).

Security layer: Security is a top priority in the infrastructure. SCANDIC TRUST GROUP implements a multi-layered security approach:

Multi-signature wallets: The treasury wallets (for reserve funds, team tokens, etc.) are designed as multi-sig, i.e. transactions require multiple independent approvals (dual control principle and more).

Hardware Security Modules (HSM): Private keys are stored in HSMs or comparably secure wallet solutions (e.g. Fireblocks) to make theft or compromise more difficult.

Smart contract audits: All relevant contracts are reviewed by external security experts prior to deployment. Audit reports are published to build trust among investors.

Monitoring & incident response: On-chain transactions and off-chain systems are monitored in real time (SIEM systems). In the event of anomalies (e.g. unusually large transfers, possible hacks), contingency plans are put into action: in extreme cases, contracts can be paused (if provided for), and an incident response team analyses and resolves problems around the clock.

Integration and interoperability: SCN is designed to integrate seamlessly into the existing IT landscape. APIs are provided that enable external systems to accept SCN (e.g. merchant integrations for Scandic Trade). If the business strategy requires multi-chain support, bridging solutions are provided to enable SCN to be represented on multiple protocols if necessary (cross-chain bridge with appropriate safeguards against replay attacks, etc.).

Performance and scaling: The chosen blockchain must be able to handle high transaction volumes (especially when large numbers of micropayments are involved, such as on the media platform). Therefore, a platform was chosen that can process thousands of TPS (transactions per second) on-chain. In addition, SCANDIC is evaluating second-layer technologies (e.g. state channels or rollups) in order to switch to Layer 2 if necessary. SCANDIC's off-chain services are built on a cloud-native architecture (containerisation, Kubernetes) so that they can scale horizontally and absorb peak loads.

In summary, SCN's technical infrastructure is based on a hybrid approach: a robust public ledger for transparency and immutability, combined with the power of its own data centres and services for an optimal user experience. This architecture makes it possible to combine enterprise IT and blockchain in such a way that users can enjoy the benefits of both worlds – the reliability and speed of traditional IT and the transparency and decentralisation of blockchain. With this foundation, SCN is able to meet industrial requirements (availability, security, compliance) while paving the way for innovative blockchain applications.

## Market analysis

The success of any token depends largely on the market environment and underlying value drivers. SCN is closely linked to the industries in which the SCANDIC GROUP operates. Therefore, SCN's performance is also driven by the growth and trends in these sectors. The following market analysis highlights the relevant segments and macroeconomic trends that form the context for SCN. Forecast data (2024/25 to 2030) is presented to illustrate the potential (see Figures 4–8 for graphical representations of selected key figures).

Overview of core segments: SCANDIC combines several future-oriented industries, namely:

Green Data Centre & Cloud Services – market for sustainable data centre services and cloud infrastructure,

Cybersecurity – IT security services and management consulting (e.g. SCANDIC SEC),

Exclusive Mobility (Private Aviation & Yachting) – niche market for affluent private and business customers,

Real Estate (Hospitality & Commercial) – high-end real estate projects with a focus on mixed-use and luxury,

Digital Media & Publishing – global market for digital news, content and paywall models,

FinTech & digital payments – in particular crypto payments and digital wallets in the B2B environment.

Growth rates: Forecasts show that sustainable data centres and cybersecurity in particular will see double-digit annual growth rates over the next five years. This is driven by the unabated hunger for data processing (cloud, AI, IoT) in combination with strict ESG requirements, as well as the increasing threat situation in cyberspace, which is forcing security investments. The luxury mobility industry (private jets, yachts) is also experiencing rising demand, driven by globalisation (business requires flexible mobility) and pandemic-related changes (affluent customers are looking for private travel alternatives). The digital media market continues to experience growth due to advancing digitalisation and the need for curated information, with new payment models (micropayments, subscriptions) offering revenue potential.

Market volumes 2025 vs. 2030: Significant revenue growth is expected in all of the above segments by 2030. Figure 4 compares the market volumes for 2025 and 2030 for key industries: For example, the volume in the green data centre market could almost double from X billion euro (2025) to Y billion euro (2030). Cybersecurity services are also growing strongly (from A billion euros to B billion euros). The private jet charter market and yacht charter market, although smaller in absolute terms, are showing significant growth in percentage terms. Digital media are increasing their digital revenues, while traditional print revenues are stagnating or falling – which is an advantage for SCANDIC as a digital player. Figure 5 illustrates the annualised growth rates for 2025–2030 in the relevant markets: all are in the high single-digit to low double-digit percentage range, with data/IT & security at the top.

Segmentation and digitalisation: SCANDIC operates in segments with a high degree of digitalisation or actively promotes their digitalisation. Figure 8 shows examples of the current degree of digitalisation in SCANDIC's segments: While cloud & payment are naturally digital (~90–100% digitalised), real estate transactions, mobility bookings and media are catching up and will achieve significantly higher digitalisation rates by 2030. SCN benefits from this, as a higher degree of digitalisation promotes the acceptance of digital tokens as a means of transaction. Linking the various areas in an ecosystem (via SCN) enables SCANDIC to realise network effects. Customers who enter the ecosystem via a platform can easily be cross-sold other services, which increases per capita customer spending and balances out fluctuations in utilisation between segments. This diversification acts as a risk buffer: if one market weakens in the short term (e.g. media), others (e.g. IT services) could compensate for this. For the token, this means greater stability, as demand is spread across several sectors.

Competitive and unique selling points: On the competitive side, it should be noted that SCANDIC is not the sole provider in any segment; however, the combination of segments makes the offering unique. For example, there are other utility tokens in the IT industry, but hardly any that are used in both media and mobility. SCN has the potential to position itself as a "lifestyle token" for companies, covering a wide range of needs. In

addition, SCANDIC differentiates itself through its high compliance and sustainability standards. In times of increasingly strict regulation (keyword: MiCA), many crypto projects could face difficulties – SCANDIC, on the other hand, has integrated compliance from the outset, which is a competitive advantage in terms of institutional customer trust.

Macroeconomic influences: Of course, SCN is also subject to external factors. General crypto market volatility (e.g. Bitcoin cycles) can influence sentiment, even though SCN primarily has utility value. Regulatory trends (new legal requirements worldwide) can create new hurdles or opportunities – SCANDIC is monitoring this closely and has proven in the past that it can respond flexibly. The economic situation in the core markets (Europe, Middle East) indirectly influences customers' willingness to spend on luxury and investment goods. A downturn could temporarily dampen the use of some services, while boom phases could generate increased demand for tokens. However, thanks to its broad positioning across sectors and regions, SCANDIC is relatively robust against individual risks – a concept analogous to portfolio diversification.

Conclusion of the market analysis: The various growth areas of the SCANDIC GROUP complement each other and together form a diversified, technologically advanced and sustainable group of companies. SCN acts as a central link, facilitating transactions and customer flows between the divisions. Its broad positioning in rapidly growing markets, combined with consistent digitalisation and smart linking of business areas, creates synergies and network effects from which investors can benefit in the long term. SCN participates in the growth of several industries simultaneously, which makes its risk/return profile attractive. The market analysis thus underpins the economic viability of the project: it addresses real demand in existing markets and skilfully exploits megatrends (digitalisation, sustainability, security).

#### Media & public relations

In addition to its operating companies, the SCANDIC GROUP also has its own media channels. Through its strategic partner LEGIER Media, the network comprises a total of 115 international daily newspapers and magazines. SCN is used here as a payment token for digital content. In an innovative media platform app, users can unlock exclusive articles and news via SCN micropayments. This reduces friction compared to traditional subscription models and anchors SCN as a media currency in the ecosystem. The group's media presence is a key asset in the introduction of the token – it makes it easier to address potential token users, increases brand awareness and contributes to transparency.

Figure 9: Distribution of SCANDIC newspapers by region – geographical reach of the company's media. Figure 10: Media collage with various publications and target groups – excerpt from the LEGIER Media portfolio.

Through a combination of its own newspapers, magazines and a network of partners, SCANDIC can efficiently promote new products such as the SCANDIC COIN token. Clear and transparent communication via these channels creates additional public trust.

#### Compliance & data protection

The SCANDIC GROUP has implemented a comprehensive compliance management system for SCN in order to meet all legal requirements and ensure the highest standards of integrity. This chapter describes the organisational structures, relevant areas of law and specific measures SCANDIC uses to ensure that the token is operated in a legally compliant, secure and ethically responsible manner. There is a particular focus on data protection, as the protection of personal data is of central importance both for regulatory reasons (GDPR) and for reputational reasons.

**Compliance organisation:** SCN has an independent compliance management system that is seamlessly embedded in the group structures. The management is supported by an internal compliance department covering the areas of law, data protection, information security, risk management and internal audits. Responsibilities and escalation paths are clearly defined; regular reports to senior management ensure transparency and enable consistent action to be taken in the event of rule violations. A comprehensive policy stack summarises all relevant guidelines, including the Code of Conduct, Privacy Policy, Supply Chain and Human Rights Policy, Modern Slavery Statement, Cookie Policy and project-specific requirements for token operation. These documents (see appendix) embody the corporate ethical guidelines that all employees and partners must follow. The risk management team coordinates the identification and assessment of legal, operational, technological and reputational risks and continuously updates the risk inventory.

**Legal & regulatory obligations:** As an issuer of a crypto asset, SCN must comply with a wide range of legal standards. The most important areas are:

**Data protection law:** Full implementation of the EU General Data Protection Regulation (GDPR) and other applicable data protection laws (e.g. the Bahrain Personal Data Protection Law, PDPL, as SCANDIC operates infrastructure in Bahrain). Personal data of customers is only processed for specific purposes and protected by appropriate technical and organisational measures. Data is only passed on to third parties on a legal basis (consent or legal permission). SCANDIC publishes a detailed privacy policy (see appendix) which explains, among other things, the data categories, purposes, storage periods and rights of data subjects. Principles such as privacy by design/default are firmly anchored in the development processes. Modern security architectures (zero trust, encryption, pseudonymisation) ensure that data security is guaranteed and compliance violations are avoided.

**Telecommunications and IT law:** As an operator of digital services, SCANDIC complies with the relevant provisions of the Telecommunications Act (TKG), ePrivacy rules and any cloud regulations. In particular, attention is paid to net neutrality, IT security requirements (e.g. in accordance with the IT Security Act/BSI basic protection) and the protection of minors. The infrastructure is designed to meet all regulatory requirements for access, interoperability and reliability.

**Crypto-asset regulation:** As outlined in the legal section, SCN fully complies with the requirements of Regulation (EU) 2023/1114 (MiCA). SCN is classified as a utility token, a white paper has been created and published, and all transparency and disclosure requirements are met. In addition, the compliance team closely monitors legal

developments – including the EU Regulation on AI (EU AI Act) and the Ukrainian law on virtual assets – in order to be able to respond proactively to new requirements.

**Supply chain due diligence:** As part of the SCANDIC GROUP, SCN is also subject to overarching corporate rules such as the German Supply Chain Due Diligence Act (LkSG) and the upcoming EU Directive on Corporate Sustainability Due Diligence (CSDDD). This means that SCANDIC reviews its suppliers and partners with regard to human rights and environmental standards (see chapter Supply Chain & Sustainability), analyses risks and takes corrective action where necessary. An anonymous complaint channel is available for reporting human rights violations. In this way, compliance is enforced not only internally, but along the entire value chain.

**Tax and commercial law:** SCANDIC ensures proper accounting and taxation of all relevant transactions in the jurisdictions in which it operates. Revenues from token sales are recorded correctly in accordance with commercial and tax law (if applicable, capitalised as intangible assets if allocated free of charge, see tax assessment). The accounting system complies with German principles (HGB, AO) and international standards (IFRS). In addition, cross-border commercial transactions (export/import of hardware, software) are handled in accordance with foreign trade and customs regulations.

**IT security standards:** SCN aims to obtain relevant certifications in the area of information security and data protection. These include, in particular, ISO/IEC 27001 (ISMS), ISO/IEC 27017 (cloud security) and ISO/IEC 27701 (privacy information management). The company already follows the NIST Cybersecurity Framework and CIS benchmarks for best practices in IT security. Regular penetration tests and security audits are carried out to ensure the resilience of the systems.

**Export control and sanctions law:** SCANDIC strictly complies with national and international sanctions lists and export control regulations. For example, no services are provided to individuals or organisations on EU/US sanctions lists; customers from certain high-risk countries (classified as non-cooperative by the FATF) are rejected. IT components may be subject to US (re-)export law (EAR), which is taken into account during procurement and provision.

**Due diligence (KYC/AML):** Before entering into a business relationship, every customer (or user of the platform) undergoes a Know Your Customer (KYC) process. For corporate customers, the company name, address and beneficial owners are verified using official register extracts. Private customers must provide proof of identity (ID check) if they carry out significant transactions or are legally considered investors. All users must also confirm that they will not use SCN for illegal activities and that they will comply with all relevant legal standards. SCANDIC has implemented guidelines to prevent money laundering and terrorist financing that comply with FATF recommendations. Transactions are monitored: algorithms check usage behaviour and transfers for anomalies (e.g. typical patterns for layering). If misuse is suspected, access is restricted and, if necessary, the incident is reported to the relevant Financial Intelligence Units. SCANDIC takes its reporting obligations very seriously, especially since, according to FATF reports, Ukraine still needs to expand its AML regulations.

Marketing & communication: SCANDIC has adopted a marketing policy that focuses on transparency and fairness. All marketing materials clearly communicate that SCN is a utility token of the SCANDIC GROUP – not an investment product with promises of profit. The actual contractual partner (SCANDIC TRUST GROUP LLC) is clearly named. Product descriptions are based on verifiable facts about availability, performance and security; exaggerated promises of salvation are avoided. In particular, no artificial urgency is created (no "FOMO" language). All published information contains a risk warning that crypto assets are volatile and that investors may lose their entire invested capital. Unfair or misleading advertising is prohibited – this complies with both MiCA (which prohibits such advertising) and the detailed requirements of VARA. In addition, SCANDIC directs its advertising exclusively at corporate customers and institutional investors; vulnerable groups (such as inexperienced retail investors) are not shown targeted advertising. Supplementary services from other brands (e.g. payment services from SCANDIC PAY, media services from LEGIER MEDIA) are advertised separately to maintain transparency. All these measures are designed to ensure that potential token buyers are fully informed and not manipulated by marketing – an essential part of investor protection.

Sanctions screening & prohibited use: SCN checks all customers and transactions against relevant sanctions lists (EU, OFAC, etc.). If a company or person involved is listed, the business relationship is refused or frozen. It is also checked that the provision of the token does not result in any violations of embargoes or export bans (e.g. no service in countries with a total embargo). SCANDIC explicitly prohibits any illegal use of the token – this includes financing terrorism, money laundering, fraud, darknet transactions, etc. If such misuse is detected, SCANDIC reserves the right to take immediate countermeasures (blocking the wallet, excluding the user) and to involve the law enforcement authorities. This zero-tolerance policy is set out in the terms of use, which every user must agree to.

Whistleblowing system: The SCANDIC GROUP operates a confidential whistleblowing system, which is also used by SCN. Employees, customers or business partners can report violations of laws, internal guidelines or human rights via a secure, anonymous channel. Incoming reports are reviewed confidentially by a specialised compliance team, investigations are initiated and any grievances are remedied. Whistleblowers enjoy protection from reprisals (whistleblower protection in accordance with the EU Directive is observed). The results and measures taken in confirmed cases are published in anonymised form to create transparency and strengthen trust in the compliance culture.

Training & monitoring: All employees working at SCN undergo regular training on relevant compliance topics – from money laundering prevention and data protection to sustainability and AI ethics. This ensures that the entire team is aware of the importance of acting responsibly. At the same time, the compliance programme itself is continuously evaluated and improved (continuous improvement): internal audits, regular management reviews and external feedback are incorporated to adapt the system to new risks or regulations. KPIs such as the number of violations identified, the status of audit recommendations, etc. are collected to measure the effectiveness of the measures.

Overall, SCN pursues a proactive compliance strategy. Even before the token issue, all the necessary structures were put in place to implement the project in compliance with

regulations. This forward-looking approach creates trust among both authorities and investors. The combination of robust guidelines, advanced technology (e.g. data protection through design) and a corporate culture of integrity forms the basis for SCN to operate not only legally but also ethically. Compliance and data protection are not a chore, but an integral part of SCN's value proposition: a token you can trust.

## AI ethics

The SCANDIC GROUP – and thus also SCN – uses artificial intelligence (AI) in various areas to optimise processes and provide innovative services. Examples range from AI-supported energy management in data centres to personalised content recommendations in media offerings. SCANDIC is aware that the use of AI requires great responsibility. The company has therefore established binding AI ethics guidelines to ensure the trustworthy, fair and transparent use of AI systems. These guidelines are based, among other things, on the emerging regulatory requirements of the EU AI Act and international principles (e.g. OECD AI principles). The key AI ethics principles and their implementation at SCANDIC are explained below:

**Transparency & explainability:** The SCANDIC TRUST GROUP attaches great importance to AI decisions being traceable. Wherever AI systems are used (e.g. for maintenance forecasts in data centres or for automated recommendations to customers), this is clearly indicated to users. Customers have the right to know that a particular result was generated by AI. In addition, SCANDIC TRUST GROUP strives to provide understandable explanations: the main factors that contributed to an AI decision are documented (as far as practicable). Example: If an AI system in SCANDIC DATA forecasts peak loads and redistributes them accordingly, an explanation log can be displayed to the administrator. Media apps display that an article suggestion is based on an AI model. SCANDIC takes the position: AI support yes, but no opaque "black box" use.

**Fairness & inclusion:** All algorithms are checked for bias and discrimination risks before going live. SCANDIC TRUST GROUP ensures that AI systems do not cause unfair discrimination based on sensitive attributes (such as origin, gender, age, etc.). For example, in the financial sector (Scandic Pay), no customer should receive poorer AI-based services solely because of the size of their company or industry. Training data sets are checked for representativeness; if necessary, corrective measures are taken (e.g. oversampling of underrepresented groups). Furthermore, SCANDIC ensures barrier-free access to AI functions – for example, by providing explanations that are understandable even to laypeople and offering alternative contact options (human support).

**Security & robustness:** SCANDIC TRUST GROUP protects AI systems from manipulation and attacks. Specifically, measures against adversarial attacks (inputs that deliberately mislead AI models) are implemented and systems are hardened against prompt injection (in language models). Regular audits of AI models check performance and vulnerabilities. Critical AI applications – e.g. an automated incident response system in IT security – are stress-tested in test environments before they are allowed to have a real impact. In addition, SCANDIC relies on redundancy wherever possible (control algorithms check the outputs of other AI systems) and always maintains a fallback



option (human override). This human-in-the-loop principle allows a responsible employee to revise decisions in case of doubt. High-risk applications (according to the EU AI Act categorisation) are subject to internal group approval and undergo a documented impact assessment process. SCANDIC meticulously documents data sources, training methods and metrics for such AI systems.

**Data protection:** Every use of AI at SCANDIC TRUST GROUP strictly follows the data protection principles of the GDPR. Personal data is only used if there is a valid legal basis (consent of the data subject or overriding legitimate interest, where permitted). Wherever possible, data is anonymised or pseudonymised before it flows into AI models. In particular, only aggregated or pseudonymised profiles are used for personalised recommendations in media or for customer analyses in SCANDIC PAY. Training on sensitive data is carried out – if unavoidable – under strict access controls, and techniques such as data masking are used to prevent conclusions about individuals. SCANDIC ensures that AI outputs do not disclose personal data without authorisation. If, for example, a language model is used in customer support, it is prevented from disclosing real customer data to the outside world (strict prompt rules for AI systems).

**Media and content ethics:** Additional principles apply to the SCANDIC TRUST GROUP's media offerings: editorial independence, fact-checking and advertising transparency are top priorities. AI-generated content (e.g. automatically generated stock market reports or translated articles) is clearly labelled as such. Users always have the right to a human contact person, i.e. they can, for example, request to be put through to a human employee in customer service if they are dissatisfied with an AI chatbot response. Furthermore, SCANDIC adheres to journalistic principles; an internal guideline prohibits the use of AI for opinion manipulation. SCN as a token plays a role here in that it serves as a means of payment on the media platform – SCANDIC ensures that economic interests (token demand) do not lead to a dilution of journalistic standards.

**Governance and control:** At management level, SCANDIC TRUST GROUP has established an ESG committee that oversees climate and social issues as well as data/AI ethics. This committee monitors compliance with AI ethics guidelines and reports to the Executive Board. There is also a group-wide policy library in which AI policies are integrated with existing compliance, data protection and supply chain policies. A person responsible ("AI owner") is appointed for each AI project, who is responsible for the development, operation and monitoring of the system. This person ensures that all checks (bias test, security test, DPIA, etc.) have been carried out prior to deployment and initiates countermeasures in the event of problems. SCANDIC TRUST GROUP also involves its stakeholders: if customers or employees express concerns about an AI system, these are investigated. It is even possible to report ethical concerns about AI use anonymously via the whistleblower system (these are treated in the same way as compliance violations).

**Legal compliance:** SCANDIC is preparing for the upcoming EU AI Act and aims to be considered an early adopter. This means that risk classifications of AI systems are already being carried out (e.g. biometric access controls – high risk; spam filters – low risk) and appropriate procedures are being implemented. If SCANDIC offers AI systems to third parties, CE conformity (in accordance with the AI Act) and registration will of course be observed. In addition, SCANDIC complies with existing sectoral regulations:

no AI for employee monitoring (unless legally permissible and proportionate), no use of AI in a manner that could violate fundamental rights. In the supply chain, SCANDIC uses AI for risk analysis, but without discriminatory criteria (e.g. country risks are taken into account, but not assessed on the basis of ethnic characteristics).

In summary, SCANDIC TRUST GROUP's AI ethics measures underscore its commitment to combining innovation with responsibility. AI should serve as a tool to achieve operational benefits (efficiency, personalisation, security) without compromising human values and rights. This philosophy is in line with SCN's overall strategy, which places compliance, ethics and sustainability on a par with growth and profitability. For investors and partners, this means that SCANDIC uses state-of-the-art technology, but always in a trustworthy and people-centred way – an approach that promotes trust and long-term success in today's digital economy.

### Supply chain

SCN's supply chain comprises a wide range of components: from the purchase of IT hardware (servers, network, storage) and energy supply to facility services (security, cleaning) and transport logistics. SCANDIC TRUST GROUP complies with the requirements of the German Supply Chain Due Diligence Act (LkSG) and anticipates the upcoming EU Corporate Sustainability Due Diligence Directive (CSDDD) ( ). Specifically, the following measures have been implemented:

**Supplier Code of Conduct:** All suppliers must comply with binding human rights and labour standards. These include the prohibition of child and forced labour, payment of fair wages, reasonable working hours, occupational health and safety, and environmental protection requirements. This code will be included in all new contracts. Suppliers in high-risk sectors or regions must provide additional evidence (e.g. certificates such as SA8000 for labour rights).

**Risk management & audits:** SCANDIC TRUST GROUP regularly conducts risk analyses along the supply chain. Particular attention is paid to raw material procurement (e.g. rare earths in electronics), hardware manufacturing and electronic waste disposal – experience has shown that these areas carry a higher risk of human rights violations or environmental pollution. Audits or certificate checks are carried out on identified high-risk suppliers. If a supplier violates standards, SCANDIC TRUST GROUP agrees on corrective measures and deadlines for remediation. Repeated or serious violations lead to the termination of the business relationship (zero tolerance).

**Whistleblowing in the supply chain:** SCANDIC provides an anonymous reporting channel that can be used not only by its own employees, but also by employees of suppliers or customers to report human rights violations or environmental problems in the supply chain. Incoming reports are carefully reviewed and appropriate action is taken (up to and including legal action against guilty suppliers).

**Modern Slavery Act & international standards:** SCANDIC TRUST GROUP integrates the requirements of the UK Modern Slavery Act 2015 and comparable international regulations into its processes. The company is committed to zero tolerance of modern slavery in any form (forced labour, debt bondage, human trafficking). A Modern Slavery Statement is published annually, describing the measures taken and progress made

(see appendix: Modern Slavery Statement). These obligations apply not only internally, but also explicitly to all partners and suppliers, who are contractually bound to these values.

**Continuous improvement:** A special team evaluates the effectiveness of supply chain measures and looks for opportunities for improvement. Benchmarks such as the Global Slavery Index are used to identify new risk areas where necessary. SCANDIC TRUST GROUP also participates in industry initiatives for fair supply chains in order to collectively raise standards.

## Sustainability

SCN is not only a technological and financial project, but also a highly sustainable and responsible undertaking. The SCANDIC GROUP has implemented extensive measures to fulfil its environmental and social responsibilities throughout the entire supply chain and to ensure that its activities are environmentally and climate friendly. This chapter describes the initiatives in the areas of climate protection, resource efficiency, supply chain responsibility, human rights, work culture and social engagement.

**Climate targets and energy efficiency:** Operating digital infrastructure is energy-intensive – SCANDIC TRUST GROUP is addressing this with ambitious climate protection targets: The company is aiming for net zero emissions (Net Zero) for Scope 1 and 2 by 2027. This means that all direct emissions (e.g. backup generators) and indirect emissions from purchased energy will be completely converted to renewable energies or offset by then. For Scope 3 (upstream supply chain, hardware production, logistics), the goal is to be climate neutral by 2030/2035. These goals underscore the company's claim to be a pioneer in green data centres. Specific measures include: Purchasing 100% green electricity (certified renewable energy) for all locations; Investing in solar panels and battery storage for self-sufficiency; Using excess waste heat from servers to heat neighbouring buildings or feed into the district heating network. Innovative cooling solutions – adiabatic cooling, free cooling, hot/cold aisle containment – minimise the energy consumption of air conditioning. SCANDIC aims for a PUE (Power Usage Effectiveness) value of  $\leq 1.25$  on a permanent basis, which is excellent for data centres. In addition, SCANDIC TRUST GROUP relies on energy-efficient hardware (servers, GPUs, TPUs with a high performance/watt ratio) and optimises software to reduce idle times. Virtualisation and containerisation help to maximise utilisation. Every kWh saved during operation means less need for compensation – efficiency is therefore the first priority, followed by compensation for unavoidable emissions.

**Data protection & information security as an aspect of sustainability:** Interestingly, SCANDIC TRUST GROUP also considers data protection and cyber security to be part of sustainability. Why? Because the trustworthy handling of data is a basis for sustainable business relationships and because secure processes also avoid wasting resources (e.g. energy wasted due to data leaks and their clean-up). Through privacy-by-design and zero-trust approaches (see Compliance chapter), SCANDIC ensures that data is effectively protected – this maintains customer trust and prevents inefficiencies. Secure, GDPR-compliant operation is thus considered a sustainability factor.

**Circular economy and environmental management:** In the area of resources, SCANDIC relies on circular economy principles. Hardware is reused wherever possible, e.g.

through second-life programmes for servers or modular systems that can be easily upgraded instead of replaced. Discarded equipment is only disposed of by certified recycling companies to ensure that valuable materials are recovered and harmful substances are treated correctly. SCANDIC's offices practise waste separation and try to keep paper consumption to a minimum (digital processes replace printing wherever possible). A zero-waste concept applies in the data centres: in addition to waste heat utilisation (see above), coolants and batteries are also recycled properly to avoid environmental damage. SCANDIC regularly measures its ecological footprint (annual CO<sub>2</sub> balances) and publishes these figures in reports to be accountable to customers and the public.

Employees and work culture: Sustainability also has a social dimension within the company itself. SCANDIC promotes a diverse, inclusive and healthy working environment. Equal pay principles apply (equal pay for equal work, regardless of gender, etc., with regular checks to ensure this). Flexible working models enable work-life balance (e.g. home office, flexitime). There are programmes for the physical and mental health of employees, such as sports activities, coaching and access to counselling services. Annual training courses on topics such as compliance, human rights, data protection, sustainability and AI ethics promote awareness of responsible behaviour among all employees. SCANDIC values internal mobility and further training: employees can grow into different areas and receive training in future-oriented technologies. This increases employee satisfaction and retention and ensures that SCANDIC remains an attractive employer that retains talent – which in turn is important for investors (retention of know-how).

Stakeholder dialogue and social contribution: SCANDIC maintains an open dialogue with stakeholders – customers, suppliers, employees, authorities and civil society. Feedback is actively sought (e.g. customer surveys, supplier discussions, regular employee surveys) and incorporated into the further development of the sustainability strategy. SCANDIC is also involved in charitable work: it promotes educational projects (e.g. IT support in schools), supports charitable initiatives and promotes digital participation among disadvantaged groups. SCANDIC is a member of industry associations for sustainable digitalisation and shares its knowledge at conferences in order to provide positive impetus for society as a whole.

SCANDIC emphasises that responsibility does not end with the provision of a token. Rather, the company sees itself as part of the solution to global challenges – whether in climate protection, strengthening a resilient digital society or protecting human rights. This self-image runs through all facets of the project. For investors, this means that SCN is managed not only according to economic criteria, but also according to environmental and social criteria – an increasingly important aspect as ESG (environmental, social, governance) gains significance in the financial sector as well.

The comprehensive explanations in this chapter show that SCANDIC takes sustainability and supply chain responsibility seriously. Through clear goals (net zero), concrete measures (code of conduct, audits, recycling) and transparent reporting, the company ensures that growth does not come at the expense of people or the environment. Rather, SCANDIC seeks to combine technology and sustainability – an approach that will secure long-term trust and acceptance for the project.

## Investor protection

The SCANDIC GROUP has a keen interest in providing comprehensive protection for investors and token users. In the crypto sector in particular, it is important to communicate potential risks openly and to give preference to responsible investment behaviour over short-term speculation. This chapter outlines the key elements of investor protection, in particular the handling of the risk of total loss ( ) and measures to prevent addiction and avoid excessively risky behaviour.

**Transparent risk warnings:** SCANDIC ensures that investors are informed from the outset about all the significant risks of investing in SCN. Clear risk warnings are included in the white paper, in all marketing materials and on the platform itself. In particular, it is pointed out that crypto assets are volatile and that investors may lose their entire invested capital. This wording of a total loss risk is clear and unambiguous. It also complies with the recommendations of many regulators and the VARA Marketing Code, which also stipulates that advertising in Dubai must contain such a warning. SCANDIC goes beyond the minimum legal requirements by making the warnings very prominent and not hiding them in the small print. For example, when purchasing SCN via the platform, a pop-up appears asking the user to reconfirm the risk information ("I am aware that I could suffer a total loss").

**No misleading promises of profits:** As part of its investor protection measures, SCANDIC completely refrains from making forecasts or promises regarding future token values or returns. Price targets are not discussed either in public statements or internally. Marketing slogans that exploit fear (fear of missing out) or create time pressure ("Invest now before it's too late") are prohibited. This conservative communication approach is intended to prevent investors from investing based on irrational expectations of profits. SCANDIC focuses on the utility value of the token, not its speculative value. In addition, real project progress (e.g. new use cases, partnerships) is communicated – but always objectively and with the caveat that success is not guaranteed. If SCN is listed on stock exchanges, it will be actively pointed out that prices fluctuate and past performance is not an indicator of future results.

**Suitability and appropriateness assessment:** Although SCN is formally considered a utility token and is not subject to MiFID, SCANDIC endeavours to ensure that only investors with appropriate experience or risk tolerance invest. When tokens are sold directly via the website, a few questions about risk profiling are asked (on a voluntary basis) – similar to financial products. For example, users are asked whether they are aware of volatility, whether they already have experience with crypto assets and whether they are only investing funds that they can afford to lose. This self-disclosure does not serve as an exclusion criterion, but is followed by personalised risk disclosure: Newcomers are offered a particularly wide range of educational resources ("What does volatility mean?", "Tips for safe handling of crypto"). The aim is to help investors make their decisions as informed as possible.

**Limits and tiered model:** SCANDIC implements an internal limit system to curb impulsive behaviour. For example, there could be daily or weekly maximum amounts for token purchases via its own platform – at least for retail-like buyers. Anyone who wants to invest more must make a conscious additional effort (e.g. confirm in writing or by

telephone). This serves to curb excessive reactions (e.g. due to hype). Likewise, no leveraged products or margin trading are offered in connection with SCN in order to prevent investors from becoming over-indebted.

Addiction prevention and awareness raising: Crypto trading can trigger addictive behaviour in susceptible individuals – comparable to gambling. SCANDIC is aware of this danger. That is why great importance is attached to not incorporating any playful elements (gamification) into the investment platform that could lead to excessive trading. There are no flashing lights or confetti animations when purchases are made, as is the case with some trading apps. Instead, SCANDIC promotes a "buy and utilise" approach rather than "buy and flip". This means that users should primarily use the token (for services) rather than simply trading it. For example, the platform prominently displays use cases ("With your SCN, you could buy XY today...") rather than just the account balance.

SCANDIC also provides information and support to help users at risk of addiction. The knowledge section contains articles on responsible investing, how to avoid emotional trading decisions, etc. There are links to external counselling services (e.g. addiction counselling hotlines, although primarily for gambling addiction – but the principle is similar). Users can set their own limits in their customer account (e.g. "max. £1,000 investment per month"), which the system then enforces – similar to self-limitation at online casinos, but here on a voluntary and preventive basis.

SCANDIC also has an internal policy that marketing is not directed at particularly vulnerable groups. For example, no targeted ads are placed for young people, senior citizens or known addiction-prone demographics. The focus on B2B marketing (companies, institutions) reduces the risk of inexperienced private individuals being targeted anyway.

Technical protection mechanisms: The SCANDIC platform could implement certain cooldown mechanisms to curb impulsive actions. For example, if a user wants to invest large amounts multiple times within a very short period of time, a query could be made or a short waiting period could be enforced ("Please confirm again in 1 hour") to break impulsive behaviour. Such mechanisms are, of course, applied cautiously so as not to hinder reasonable use, but they are incorporated into the UX design as an idea.

Legal protection & disclaimer: SCANDIC clearly states in its terms and conditions which limitations of liability apply. It is made clear that investors act on their own responsibility and that SCANDIC cannot compensate for any losses (except in cases of proven fault on the part of SCANDIC). It is also disclosed that the token is not legal tender and that there is no depositor protection as with bank deposits. These clarifications serve to provide legal protection, but also to anchor investors in reality.

Monitoring of token trading: Even after issuance, SCANDIC will keep an eye on SCN trading (as far as possible with decentralised trading). If unusual price manipulation or pump-and-dump patterns are noticed, SCANDIC would issue a public warning and inform the community. Although it has no direct influence on secondary markets, SCANDIC considers it its moral duty not to stand by and watch such things happen. Through close communication with the community (e.g. via social media, newsletters),

investors can at least be warned if, for example, fraudsters are at work (scam tokens with similar names, etc.).

Education & community support: Long-term investor protection also means making investors more competent. SCANDIC invests in educational offerings: tutorials, webinars, FAQs on the safe use of crypto (e.g. self-custody vs. platform custody, setting up 2FA, recognising phishing). The more users know, the less likely they are to panic sell or fall for scams – aspects that in turn contribute to protection against loss. SCANDIC's community management encourages questions and exchange so that newcomers can learn from experienced users.

Conclusion: Through these diverse measures, SCN ensures that investor protection is not just a buzzword, but a living practice. While it is impossible to guarantee that total losses will be avoided – the inherent risk remains – SCANDIC does its utmost to educate investors about risks and make the worst-case scenarios less likely (e.g. through sound project management, anti-fraud measures, contingency plans). Addiction prevention demonstrates ethical awareness: the aim is not to profit from users' uncontrolled trading, but from their genuine use of the token. This philosophy should help to build trust among a public that has become critical and often complains about the lack of investor and consumer protection, particularly in the crypto sector. SCANDIC is deliberately positioning itself here as a reputable player that prefers to build stable long-term relationships rather than make short-term profits at the expense of small investors.

## Roadmap 2024–2027

The following roadmap outlines the planned milestones of the SCANDIC COIN project until 2027. It serves as a guide for investors on what development steps and value drivers can be expected in the coming years. (Note: Timelines may shift depending on market conditions and regulatory approvals; the roadmap will be updated regularly.)

2024 – Launch and lay the foundation: - Q1 2024: Finalisation of regulations & white paper. Completion of legal opinions, submission of the MiCA white paper to the supervisory authority (if necessary). Website launch with investor portal and publication of all policy documents (imprint, data protection, compliance and ethics guidelines) for transparency. - Q2 2024: Token Generation Event (TGE) – Technical launch of SCANDIC COIN on the selected blockchain. Initial seed sale to strategic partners and institutional investors (private offering). Establishment of the liquidity pool with €250k and start of decentralised trading (e.g. on Uniswap) with simultaneous listing on a first centralised exchange (if partnership exists). Implementation of vesting and lock-up agreements for team & advisors. - Q3 2024: Public sale & platform integration – Public token offering (e.g. IEO on a renowned exchange or launchpad) for a broader investor base. Integration of SCN as a means of payment in initial SCANDIC services: e.g. activatable in Scandic Pay Wallet, test phase for SCN payments in the Scandic Media App (micropayments). Start of a bug bounty programme to further improve smart contracts and security. - Q4 2024: Regulatory compliance & MiCA launch: Entry into force of the main MiCA provisions (December 2024) – SCANDIC has completed all necessary registrations and is operating in compliance. Building a community (forum, regular updates). Publication of the first transparency report on token distribution, use of funds and progress. Preparation for ISO 27001 certification (initiate audit process).

2025 – Expansion of use & ecosystem growth: - H1 2025: Establishment in the SCANDIC ecosystem: SCN will now be made available in all core brands of the SCANDIC GROUP. Example: Launch of a customer portal where companies can pay for cloud services with SCN (with a discount compared to fiat). Introduction of a loyalty programme: Frequent flyers with Scandic Fly or regular customers with Scandic Yachts receive bonuses in SCN. Publication of a case study on the first use cases (e.g. how a customer used SCANDIC COIN to combine different services) to market the utility value. - H2 2025: Internationalisation & partnerships: Examination of expansion into additional geographical markets. Initiation of partnerships with external companies that accept SCN – e.g. luxury goods retailers in the Scandic Trade environment or hotel chains for Scandic Estate. Listing SCN on additional exchanges in key jurisdictions (e.g. an EU-regulated exchange, an Asian platform) to increase liquidity and reach. Continuation of tech development: possible implementation of Layer 2 scaling (should L1 transaction fees become too high) and continuous wallet UX improvements.

2026 – Maturity phase and diversification: - Throughout 2026: Ecosystem expansion & maturity: SCANDIC COIN achieves a stable user base. The number of active wallets (companies and individual users) has grown continuously. SCANDIC introduces a governance function: e.g. large token holders can vote on certain parameters or the prioritisation of new use cases (utility token with participation feature). Evaluation of whether SCN will be used as an internal settlement token in the SCANDIC GROUP to make intra-group settlements more efficient. Further focus on compliance: Preparation for possible Ukrainian legislative changes (which may come into force in 2026); close cooperation with regulatory authorities to serve as a compliant example project. SCANDIC is expected to reach several milestones in 2026: e.g. successful ISO 27001 certification, inclusion in sustainable crypto indices (if available), etc. - Q4 2026: Network effects & economic validation: By the end of 2026, the synergies in the ecosystem should be evident: SCANDIC publishes data showing that users who use SCN in one area are also increasingly using other SCANDIC services (cross-selling rate). Robust KPIs will be presented, such as transaction volume in SCN per quarter, number of partner companies, CO<sub>2</sub> savings through SCN use (e.g. digital vs. physical processes). These successes will help to convince potential new investors or major customers.

2027 – Sustainability goal and ongoing innovation: - Throughout 2027: Net zero & project consolidation: The year 2027 will be marked by the achievement of net zero (Scope 1&2) targets. SCANDIC will be able to announce in its 2027 sustainability report that its entire operations are climate neutral. This is not only an ecological triumph, but also effective from a marketing perspective – SCN will be positioned as a "green utility token". Technologically, 2027 could be the point at which the blockchain or off-chain infrastructure becomes upgradeable (e.g. migration to Blockchain 3.0 protocols or integration of CBDCs, if relevant for Scandic Pay). - H2 2027: Reflection and next steps: After around three years on the market, a strategic review will be carried out: Which use cases have proven particularly successful? Where is there potential for optimisation? This may result in an SCN 2.0 concept being prepared (e.g. technical upgrades, new utility features or a limited additional issue for new partners – all depending on the circumstances at the time). By 2027, SCANDIC will also have examined whether the model can be extended to other industries or whether to focus on core segments. Investors will be informed transparently about the results of these considerations.



Figure 11: Mini roadmap 2024–2027 – visualisation of the above points with a timeline.

The roadmap clearly shows that SCN is following a clear development plan that includes technical milestones as well as market and compliance goals. It is important that flexibility is maintained in order to respond agilely to changes (market dynamics, regulation). Each phase is designed to create added value – whether through new applications, increased security or increased demand. For investors, the roadmap illustrates when which value enhancement potentials are to be leveraged (e.g. broader adoption ~2025, full ecosystem impact ~2026, ESG compliance ~2027). SCANDIC is committed to achieving these goals on schedule and will communicate openly about progress and any changes to the plan.

#### Final remark

SCN (SCN) represents a novel utility token model that is applied in a broadly diversified corporate environment. In this white paper documentation, we have examined the numerous facets of this project in detail – technical, legal, economic and ethical. In conclusion, the key points should be summarised once again and placed in the overall context:

SCN is at the heart of a comprehensive ecosystem that connects industries ranging from cloud computing and FinTech to media and luxury mobility. This unique combination creates synergy effects that give the token real utility and a stable demand structure. SCN is not an isolated crypto asset, but is embedded in business models that have been established and growing for years. For investors, this means investing in a holistic business ecosystem rather than a single unproven concept.

At the same time, SCN is characterised by an uncompromising approach to compliance and governance. From the very beginning, MiCA requirements were observed, international legal jurisdictions were evaluated and a white paper was created – even though exemptions might have applied. SCANDIC GROUP thus demonstrates that it takes voluntary commitments seriously – a plus point in an industry often characterised by regulatory arbitrage. All risks relevant to investors – whether legal (regulation), technical (smart contract security gaps) or market-related (volatility) – are actively managed and communicated openly.

The technical infrastructure behind SCN combines the best of both worlds: the transparency of blockchain and the reliability of professional IT infrastructure. This dual model ensures that SCN transactions are secure, fast and energy-efficient. The use of a green PoS blockchain and its own sustainable data centres is forward-looking and in line with the company's ethos. Its commitment to AI ethics and data protection also shows that SCANDIC is aware of its responsibility in the digital society – a "responsible tech" approach that builds trust among customers and authorities.

On the economic side, market analysis underscores that SCANDIC COIN is integrated into attractive growth segments and can act as a multiplier for their development. Investors indirectly participate in megatrends such as digitalisation, cybersecurity and sustainable mobility, bundled into a single token. This diversified exposure can potentially spread risks and multiply opportunities, making SCN interesting from a portfolio perspective.

Particularly noteworthy is the clear commitment to investor protection. SCANDIC goes above and beyond industry practice to ensure transparency, education and prevention. The company wants SCN investors to become long-term partners, not gamblers chasing quick profits – communication and the entire orientation are designed accordingly. In an industry that has unfortunately seen cases of mismanagement and fraud, SCANDIC consciously positions itself as a trustworthy player with solid business fundamentals and ethics.

Outlook: SCN is on the verge of completing the implementation phase and entering the growth phase. The next few years will be crucial for rolling out the outlined use cases, gaining partners and establishing a vibrant token economy. Thanks to the roadmap, investors know what steps will follow and can track progress. SCANDIC is committed to keeping the community regularly informed – via quarterly reports, online AMA (Ask Me Anything) sessions with management and possible on-chain governance surveys. The white paper is treated as a living document and updated as necessary to reflect the current status of the project.

SCN combines the innovative power of crypto technology with the solidity of classic corporate management. This white paper has shown that the token is backed by a well-thought-out concept, a capable team and a responsible organisation. We would like to thank our readers for their interest and invite investors, customers and regulators alike to engage in dialogue with us. Only through continuous feedback and cooperation can we make SCN what it is meant to be: a best-practice example of utility tokens that offer real added value, are designed to be regulatory compliant and, at the same time, uphold the principles of sustainability and ethics.

With this in mind, thank you for your attention. SCN looks forward to working with you to shape the next generation of digital business models – secure, transparent and sustainable.

## Glossary

Utility token: A crypto token that primarily serves to provide access to a service or product (right of use) and is not designed as an investment with a claim to profit. SCN is a utility token because it functions as a means of payment and access authorisation within the SCANDIC ecosystem.

MiCA: Markets in Crypto-Assets Regulation, Regulation (EU) 2023/1114, which creates a uniform EU-wide legal framework for crypto-assets. Among other things, MiCA regulates the obligation to produce a white paper, transparency requirements and approval requirements for certain tokens.

VARA: Virtual Assets Regulatory Authority, supervisory authority in Dubai, created by Dubai Virtual Assets Law No. 4/2022. Regulates crypto activities within Dubai and issues licences to virtual asset service providers. Relevant for SCANDIC as the holding company is based in Dubai – however, not applicable as long as no operational activities take place there.

Reverse solicitation: Exception principle (especially in MiCA) whereby no licence is required if a service provider from a third country only conducts business with EU

customers at the customer's initiative. Serves to distinguish whether a foreign provider is "specifically targeting the EU market" or not. SCANDIC uses this principle to serve EU customers without an EU licence, keeping records (logs) for verification purposes.

KYC/AML: Know Your Customer and Anti Money Laundering, summary of obligations to identify customers and prevent money laundering. SCANDIC conducts KYC checks on all customers (identity verification) and monitors transactions to detect money laundering and terrorist financing.

Total loss risk: The risk that an investment will lose its entire value. With highly volatile assets such as crypto tokens, there is a possibility that the market price will fall to zero. SCANDIC expressly points out this risk and takes measures to protect investors (see the chapter on investor protection).

Addiction prevention (in the financial market): Measures designed to prevent investors from developing addictive trading behaviour (excessive, impulsive trading similar to gambling). These include limits, cooldown periods, avoidance of manipulative app designs, etc. SCANDIC implements such measures for the benefit of its users.

ESG: Environmental, Social, Governance – criteria for sustainability in the environment, social issues and corporate governance. SCANDIC meets various ESG criteria, e.g. climate strategy (E), human rights & diversity (S), compliance & transparency (G). Investors are increasingly attaching importance to ESG compliance.

Scope 1, 2, 3: Categories for classifying a company's CO<sub>2</sub> emissions. Scope 1: direct emissions (e.g. on-site combustion of fossil fuels); Scope 2: indirect emissions from purchased energy (electricity, district heating); Scope 3: all other indirect emissions along the value chain (suppliers, product use, commuting, etc.). SCANDIC aims to achieve net zero in Scope 1+2 by 2027.

EU AI Act: Planned EU regulation on AI systems that defines risk classes and sets requirements for high-risk AI (transparency, conformity assessment, etc.). SCANDIC is preparing for this regulation by, for example, reviewing and documenting AI impacts and introducing internal AI guidelines.

## Imprint

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Email: Commercial register: Legal notice: SCANDIC ASSETS FZCO and LEGIER  
Beteiligungs mbH act as non-operational service providers. All operational activities of  
SCANDIC DATA are carried out by SCANDIC TRUST GROUP LLC. SCANDIC  
ASSETS FZCO is the holding company and owner of the brands; operational and all

responsible activities are carried out by SCANDIC TRUST GROUP LLC. Service description: SCANDIC COIN is a utility token of the SCANDIC GROUP that provides access to digital services within the SCANDIC ecosystem. It is not e-money or a security. All operational activities related to SCANDIC COIN are performed by SCANDIC TRUST GROUP LLC; SCANDIC ASSETS FZCO and LEGIER mbH act as non-operational service providers.

Disclaimer: The contents of this white paper are for informational purposes only and do not constitute investment advice or a public offering in the legal sense. Despite careful review, the provider assumes no liability for the timeliness, completeness, or accuracy of the information. Investments in crypto assets involve high risks (up to and including total loss). The provider is not liable for losses unless they are based on intent or gross negligence on the part of the provider. Legally binding commitments regarding SCANDIC COIN arise exclusively from the official contract documents and legal requirements.

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Dispute resolution: The provider is not obliged and not willing to participate in dispute resolution proceedings before a consumer arbitration board. However, any disputes can be settled amicably by emailing the above contact.

Applicable law: This white paper is subject to the law of the issuer, taking into account mandatory EU consumer protection standards (in particular MiCA) and local laws in the respective sales markets. The extraterritorial effect of some regulations has been taken into account (see Legal section). The place of jurisdiction for disputes in connection with SCANDIC COIN is – to the extent permitted – Dubai, United Arab Emirates.

Status of this white paper: October 2025.

#### SCN – ULTIMATE FINAL WHITEPAPER 2025/26

Scandic Data – Cloud and data centre services based on sustainable, energy-efficient data centres that are essential for hosting the in-house platforms.

Scandic Trust – The group's platform responsible for treasury, management of the utility token and settlement of the liquidity pool.

Scandic Pay – Payment system and e-wallet solution for easy processing of transactions in SCN and fiat.

Scandic Estate – Real estate projects and investments, particularly in the hospitality and mixed-use real estate sectors.

Scandic Fly – Aviation and drone services, including private jet charter, ambulance flights and freight logistics.

Scandic Yachts – Yacht sharing and charter services that provide exclusive experiences on board and use the token as the booking currency.

Scandic Trade – Trading and marketplace platform for goods and services (including precious metals, energy certificates and luxury goods).

Scandic SEC – Security and management consulting for physical and digital protection.

Scandic Health – Health services, telemedicine and lifestyle management.

Mammoth symbol – The traditional brand symbol of the SCANDIC TRUST GROUP for the utility token "SCN", which embodies strength and endurance.

Legal framework for utility tokens in Hong Kong

Legal framework for utility tokens in Hong Kong

Starting point: Hong Kong has no specific legal regulation for ICOs. Instead, general financial and money laundering rules apply: the decisive factor is whether a token is considered a regulated financial product (in particular as a "security" or part of a collective investment scheme). If these characteristics are not present, a company can generally offer utility tokens without being subject to prior approval. However, general legal provisions (e.g. on fraud prevention, money laundering prevention, terms and conditions/prospectus requirements) must be observed. Reference to EU compliance (AML/KYC, LkSG) does not exempt companies from local requirements in Hong Kong.

#### 1. Is it possible to issue utility tokens without authorisation?

Principle: Hong Kong companies may issue utility tokens and offer them for sale to the public as long as these tokens are not regulated financial instruments. There is no separate "token licence". Prior approval by the SFC or another authority is only required if the product is subject to securities or other financial law.

Securities & Futures Ordinance (SFO): However, if a token qualifies as a "security" or as an equity or debt instrument (see section 3 below), the SFO applies. Public offerings of such tokens are then subject to the strictest requirements (prospectus requirement, distribution only through licensed intermediaries, sale usually only to professional investors). Without a licence, any sale of such securities in Hong Kong is punishable by law.

Licence-required activities: As a general rule, anyone conducting investment-related activities in Hong Kong (e.g. "Type 1" securities trading or "Type 4" investment advice) requires a licence from the SFC. If a company violates these rules, it is conducting investment business without authorisation.

Exceptions: Pure utility tokens – i.e. those that primarily grant access to future services or platform functions – are usually not covered by the SFO in practice. They can therefore often be issued without explicit authorisation. However, the line between the two is blurred. Simply labelling a token as a "utility token" does not exempt it from regulation if its substance and marketing are aimed at raising capital for the issuer.

Fraud and other laws: Regardless of the SFO, all token issuers in Hong Kong are subject to general laws against deception and fraud. For example, the Anti-Money Laundering Ordinance (AMLO) prohibits "fraudulent or misleading" practices in transactions involving virtual assets. Therefore, anyone promoting a supposedly risk-free

utility token must ensure that offers and white papers do not contain false promises of profit. The same applies to advertising claims that are subject to unfair competition criteria.

PR and marketing rules: Under the Companies Ordinance, a public invitation to purchase ("Invitation to the Public") may trigger a prospectus requirement if the tokens are considered "securities". If this is circumvented (e.g. no advertising in Hong Kong, only to professional investors), an exception may apply. Nevertheless, the authorities pay attention to the overall nature of the transaction: if Hong Kong investors are specifically targeted (e.g. via local websites, social media in Hong Kong, local partners), even a token sale that is supposedly planned "offshore" may be treated according to local rules.

2. Relevant laws and regulations

3. Classification of utility tokens as securities

Utility tokens are only exempt from financial supervision as long as they actually only grant access to a service. As soon as investors primarily act with expectations of returns, the token can be reclassified as a financial instrument under the Securities and Futures Ordinance. Typical characteristics for this classification are:

Investment expectation: Promise or expectation of profits, dividends or increases in value. Example: A token whose value is determined solely by the growth of a project or profit shares is similar to an equity token or a bond.

Equity capital: Token represents a share in the company or its profits. This meets the definition of an "equity security".

Promissory note: Token promises repayment plus interest. This would correspond to a bond or loan.

Collective investment: If a token purchase formally channels money into a joint project or fundraising from which several investors receive "collective" returns, the offering may be an unlicensed investment fund (collective investment scheme). Even offerings that are similar in structure to an investment fund (e.g. pooling of funds for trading purposes) are regulated.

Secondary trading: If the token allows immediate or near secondary sale (marketplace, stock exchange), this increases the likelihood that investors will see it as an opportunity for return. The indication of an active secondary market may favour reclassification as a security.

Marketing: Anyone who focuses primarily on price gains or profit in a utility token, rather than its actual utility function, also risks securities classification. An exclusive emphasis on platform usage and unexcited communication help to convince regulators that it is a genuine utility product.

Practical consequences: Once a token is classified as a security, SFO regulations automatically apply. Public offerings must then either be prospectus-based or restricted to professional investors. Distribution, advice and trading may only be carried out by

SFC-licensed intermediaries. Failure to comply may result in criminal penalties (including imprisonment for unlicensed financial transactions).

#### 4. Role of the Hong Kong Securities and Futures Commission (SFC)

The SFC is the central financial supervisory authority for securities and futures in Hong Kong. Its tasks in the context of utility tokens are:

**Regulation of security tokens:** The SFC treats security tokens (tokens that are classified as securities) like traditional investment products. This means compliance with the SFO (licensing, disclosure, investor restrictions). The SFC also monitors and sanctions well-known ICO companies whose tokens it classifies as unauthorised investment products.

**Licensing and supervision:** Any Hong Kong service provider trading in security tokens (crypto exchanges, brokers, issuers, dealers) requires an appropriate licence (often Type 1 for trading/issuing). Even fund managers investing in tokens must be licensed. The SFC may refuse or revoke licences if guidelines are violated.

**Virtual Asset Trading Platform (VATP) regime:** Since June 2023, the SFC has required all crypto trading platforms operating in Hong Kong or accepting Hong Kong investors to obtain a licence as a VASP. This means that trading in non-securities tokens (e.g. purely utility-based cryptocurrencies) is also regulated for the first time. Listed tokens (including non-securitised tokens) must meet certain risk mitigation requirements. In principle, this systematically includes all trading service providers serving HK investors in the regulatory system.

**Investor warnings:** The SFC maintains an "alert list" of fraudulent or illegal crypto and investment products (including ICOs and tokens). SCANDIC tokens would appear on this list promptly if they were suspected of being dubious. The SFC publicly warns investors to be cautious about untested token offerings.

**Educational and procedural guidelines:** The SFC has published guidelines on online distribution (high information requirements, warnings) and special FAQs for virtual assets. It also offers "regulatory sandbox" programmes for new financial products, but token IPOs rarely fall under such initiatives.

**Coordination with other authorities:** The HKMA is primarily responsible for stablecoins (see below). The SFC, HKMA and Customs work closely together to combat money laundering. The SFC is also involved when tokens are integrated into financial products (e.g. token-based exchange-traded funds).

#### 5. Scope for creativity and circumvention options

Since token issuance is effectively prohibited in Hong Kong, companies are looking for alternative strategies. Possible approaches include:

**Offshore structure:** The token issuer is established in a jurisdiction outside Hong Kong (e.g. Cayman Islands, BVI, Dubai). This is intended to prevent local securities laws from applying. Caution: If the parent company continues to operate in HK or addresses HK customers, intervention by the SFC remains possible. The "placement" solely with offshore investors must be verifiable (e.g. through whitelisting).

No advertising in Hong Kong: Marketing exclusively outside Hong Kong (e.g. via international channels) can minimise the risk. It is important that no advertising messages end up in Hong Kong, no local PR firm is hired and the sales communication is clearly "not intended for HK persons". A reputable exclusion procedure (age verification, residence data) should be implemented.

Restriction to professional investors: If the token is only offered to qualified investors (e.g. with minimum assets), some consumer protection regulations do not apply. In Hong Kong, professional investors (high net worth individuals, institutional investors) are defined. By carrying out appropriate checks and excluding private investors, the strict protective measures of the SFC can be circumvented. However, the licensing requirement would remain in place if securities are involved – the only solution here is not to classify them as securities in the first place.

Geographical separation: The offering is focused on markets outside Hong Kong (e.g. no branches in HK, instead headquartered in Dubai/Berlin). This includes token sales being conducted via a foreign platform to which the HK jurisdiction has no access. Nevertheless, the rules apply as soon as Hong Kong residents are involved – for example, if a local partner company accepts payments.

Technical design: Some projects use complex technology (smart contracts, sidechains) to make legal classification more difficult. A pure peer-to-peer platform without a central "issue authority" can help argue that it is not a company within the meaning of the SFO. However, the SFC states: "substance over technology" – the main thing is the economic content of the offer, not its blockchain architecture.

Limitation through contract design: Certain rights can be excluded in the token contract (smart contract, terms) (e.g. no claim to profit sharing, no repurchase obligation). From a legal perspective, however, this is doubtful: even if profits are excluded by contract, judges/regulatory authorities pay attention to practice (circumvention clauses, if applicable).

Use partner network: SCANDIC has partners in Dubai, Berlin and Ukraine. One option would be to carry out sales or key management functions outside Hong Kong. If the token sale is de facto carried out by a non-HK company, Hong Kong law may be less applicable – however, the SFC can also act in Hong Kong in such cases if a significant part of the organisation is based here.

Regulatory applications: Finally, there is always the option of consulting with the SFC. The authority encourages disclosure for innovative products. If an approval process (e.g. within the sandbox) is started at an early stage, a formal assessment can be carried out. However, this involves bureaucracy and conditions (possibly only a professional sale, reporting requirements).

Summary: Companies in Hong Kong – such as SCANDIC FINANCE – can issue utility tokens as long as they do not violate securities law, money laundering rules or licensing regulations. A pure utility function without a promise of return does not normally lead to any obligation to obtain regulatory approval. In practice, however, the tokens must be structured and advertised in such a way that the focus is really on genuine utility and not on the chances of redemption. In any case, a careful compliance concept (including



AML/KYC in accordance with local standards and, if necessary, registration as an MSO/VASP) is essential to avoid sanctions. Ukuba (If all else fails), SCANDIC can attempt to limit the scope of Hong Kong regulation by using offshore issuers and targeted investor restrictions – however, the chances of success depend heavily on the specific product design and the business model in practice.

## **Compliance**

### **Compliance framework of SCANDIC FINANCE GROUP LIMITED**

0. Applicability to brand ecosystem and partner companies This compliance framework applies to the brand ecosystem of SCANDIC FINANCE GROUP LIMITED, in particular to the following brands and services:
- SCANDIC SEC
  - SCANDIC FLY
  - SCANDIC PAY
  - SCN
  - SCANDIC CARS
  - SCANDIC DATA
  - SCANDIC SETUP
  - SCANDIC TRUST
  - SCANDIC CARDS
  - SCANDIC ESTATE
  - SCANDIC YACHTS
  - SCANDIC HEALTH
  - SCANDIC FINANCE and all structures held or supported by SCANDIC FINANCE GROUP LIMITED. The compliance framework takes into account the cooperation structure with the following companies:

Legally responsible: SCANDIC FINANCE GROUP LIMITED Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong, SAR-PRC Telephone headquarters Switzerland, Zurich: +41 44 7979 99 – 85 Email: Commercial register: in cooperation with: SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001, United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register: in cooperation with: SCANDIC TRUST GROUP LLC IQ Business Centre Bolsunovska Street 13–15 Kyiv — 01014, Ukraine Telephone Headquarters United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60 Email: Commercial register extract:

in cooperation with: LEGIER BETEILIGUNGS GMBH Kurfürstendamm 14 10719 Berlin, Federal Republic of Germany Commercial register number Berlin: Commercial register entry number 57837 Telephone: +49 30 9921134 – 69 Email: Commercial register: Legal notice: SCANDIC ASSETS Free Zone Company, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP Limited Liability Company act as non-operational service providers. All operational and responsible activities within the scope of this compliance framework are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

1. Introduction and purpose 1.1 Objective of the compliance framework This compliance framework defines the principles, structures, processes and responsibilities for ensuring the legal compliance, integrity and transparency of SCANDIC FINANCE GROUP LIMITED and all brands and structural companies mentioned in Section 0.

The purpose of this compliance framework is, in particular:

- to ensure compliance with all applicable laws, regulations and official requirements in all relevant jurisdictions,
- the implementation of internationally recognised standards of good corporate governance,
- to respect and promote human rights, environmental and social standards throughout all value and supply chains,
- the prevention of corruption, bribery, money laundering, terrorist financing and sanctions violations,
- the protection of personal data, trade secrets and other confidential information,
- the implementation of an effective system for whistleblowers,
- the establishment of clear escalation and sanction mechanisms for compliance violations.

1.2 Reference to international and national standards The compliance framework is based in particular on:

- the United Nations Guiding Principles on Business and Human Rights,
- the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises,
- European regulations, in particular the Regulation of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (General Data Protection Regulation) and the due diligence requirements for corporate supply chains,
- the Supply Chain Due Diligence Act of the Federal Republic of Germany,
- the law of the Hong Kong Special Administrative Region of the People's Republic of China (including company law and financial market law standards),
- the relevant legislation of the United Arab Emirates,
- the law of Ukraine,
- the law of the United Kingdom of Great Britain and Northern Ireland,
- the law of the Swiss Confederation,

- all other applicable legal systems, but with express jurisdiction in Hong Kong / SAR-PRC.

1.3 Nature of the document This compliance framework is a group-wide guideline and an integral part of the corporate organisation. It is binding on all bodies, managers, employees, consultants and relevant external partners, insofar as this is permissible under labour and company law.

2. Scope and target audience 2.1 Social scope The scope covers:

- SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong,
- all brands and services of the SCANDIC FINANCE brand ecosystem,
- the cooperating companies SCANDIC ASSETS Free Zone Company, SCANDIC TRUST GROUP Limited Liability Company and LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung,
- all subsidiaries, affiliates, joint ventures, representative offices and branches, but with express jurisdiction in Hong Kong / SAR-PRC.

2.2 Personal scope The compliance framework is aimed at: - members of the administrative and management bodies, - managing directors, directors, - all employees, - freelancers, agents, representatives, - external service providers, intermediaries, sales partners.

3. Basic principles of compliance SCANDIC FINANCE GROUP LIMITED is committed to the following basic principles:

- Legal compliance,
- integrity and transparency,
- zero tolerance of corruption,
- Respect for human rights,
- Protection of the environment,
- Data protection and information security,
- Responsible financial services,
- Transparent communication,
- effective prevention and control,
- Protection of whistleblowers.

4. Governance structure and responsibilities 4.1 Responsibility of SCANDIC FINANCE GROUP LIMITED The ultimate responsibility for compliance lies with the management or administrative body of SCANDIC FINANCE GROUP LIMITED, with express jurisdiction in Hong Kong / SAR-PRC.

4.2 Role of cooperating companies as service providers SCANDIC ASSETS Free Zone Company, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP Limited Liability Company act as non-operational service providers; all legal and administrative responsibility lies with SCANDIC FINANCE GROUP LIMITED.

4.3 Compliance organisation A multi-level compliance organisation has been established at SCANDIC FINANCE GROUP LIMITED: - Group-wide compliance function (Group Compliance), - Local compliance officers, - External compliance officer.

4.4 Responsibilities of managers and employees Managers bear special responsibility; all employees are obliged to be familiar with and comply with the framework. 5. Risk and compliance management 5.1 Risk identification, 5.2 Risk analysis, 5.3 Risk management and 5.4 Documentation describe the systematic identification, assessment, management and documentation of risks and are set out in the preambles to the supply chain documentation.

6. Corruption prevention and integrity Zero-tolerance policy towards corruption and bribery. Prohibition of improper payments, permission only for appropriate, documented and transparent gifts.
7. Prevention of money laundering, terrorist financing and sanctions violations Risk-based identification checks (Know Your Customer / Know Your Business), ongoing monitoring, sanctions list checks, reporting of suspicious circumstances.
8. Human rights, labour and social standards Rejection of forced labour, child labour, human trafficking and discrimination. Ensuring humane working conditions, fair wages and occupational safety.
9. Environmental, climate and resource protection Responsible use of energy and resources, reduction of emissions, consideration of ecological criteria in investments and supply chains.
10. Supplier, third-party and partner management Transparent selection procedures, compliance clauses, auditing rights, termination of business relationships in the event of violations.
11. Data protection, information security and confidentiality Compliance with the General Data Protection Regulation and local data protection laws, technical and organisational measures to protect personal data and confidential information.
12. Product-specific compliance in the financial and fiduciary sector Special requirements for payment services, digital assets, asset management, fiduciary and investment products.
13. Conflicts of interest Avoidance and management of conflicts of interest through internal guidelines, organisational separation, disclosure requirements.
14. Whistleblower system and complaint mechanism Provision of secure reporting channels (online system, email, telephone, external ombudsman), confidential treatment, protection against reprisals.
15. Training, communication and awareness raising Regular training on legal and compliance issues, group-wide communication of guidelines and changes.
16. Monitoring, internal controls and investigations Risk-based audit plans, internal audits, evaluation of key figures, internal investigations in cases of suspicion.
17. Sanctions and measures in the event of violations Labour law, civil law and, if applicable, criminal law consequences, termination of business relationships, organisational adjustments.

18. Special features of individual legal systems Specific requirements for Hong Kong, Switzerland, the United Arab Emirates, the United Kingdom, the Federal Republic of Germany, Ukraine and other affected countries.
19. Entry into force, review and further development Entry into force with approval by management, annual and event-related review, continuous improvement.
20. Contact for compliance matters SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong, SAR-PRC Telephone headquarters Switzerland, Zurich: +41 44 7979 99 – 85 Email:

Drafted, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED Hong Kong, SAR-PRC, 1 December 2025 Legal representation: Clifford Chance, Global Law Firm

## **Imprint**

### Imprint of the SCANDIC BRAND ECO-SYSTEM

- Overview Library
- Providers
- Service description
- Disclaimer
- Copyright
- Consumer information and dispute resolution
- VAT notice
- Applicable law
- Library of legal principles

This IMPRINT contains information about the provider of these platforms, which are operated by:

- SCANDIC FLY
- SCANDIC SEC
- SCANDIC PAY
- SCN
- SCANDIC CARS
- SCANDIC DATA
- SCANDIC SETUP

- SCANDIC TRUST
- SCANDIC CARDS
- SCANDIC ESTATE
- SCANDIC YACHTS
- SCANDIC HEALTH
- SCANDIC FINANCE

as well as the information required by law.

Provider:

The provider of the services offered under the brands:

- SCANDIC FLY
- SCANDIC SEC
- SCANDIC PAY
- SCN
- SCANDIC CARS
- SCANDIC DATA
- SCANDIC SETUP
- SCANDIC TRUST
- SCANDIC CARDS
- SCANDIC ESTATE
- SCANDIC YACHTS
- SCANDIC HEALTH
- SCANDIC FINANCE is the SCANDIC FINANCE GROUP, represented by:  
SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative  
Region (SAR) of the People's Republic of China (PRC).

Responsible: SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong  
Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong/ SAR /  
PRC Phone HQ - Switzerland, Zurich: +41 44 7979 99 – 85 Mail: Commercial register:

in cooperation with:

SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001 /  
United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register:

in cooperation with:

SCANDIC TRUST GROUP LLC

IQ Business Centre Bolsunovska Street 13-15

Kyiv — 01014 / Ukraine Telephone HQ – United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60 Email: Commercial register:

in cooperation with:

LEGIER BETEILIGUNGS GMBH

Kurfürstendamm 14

10719 Berlin / Federal Republic of Germany

Commercial register Berlin: HRB 57837 Phone: +49 (0) 30 9921134 – 69 Email:  
Commercial register:

Legal notice: SCANDIC ASSETS FZCO, LEGIER Beteiligungs GmbH and SCANDIC TRUST GROUP LLC act as non-operational service providers. All operational and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

All operational activities under the brands: - SCANDIC SEC

- SCANDIC FLY
- SCANDIC PAY
  - SCN
  - SCANDIC CARS
  - SCANDIC DATA
  - SCANDIC SETUP
  - SCANDIC TRUST
  - SCANDIC CARDS
  - SCANDIC ESTATE
  - SCANDIC YACHTS
  - SCANDIC HEALTH
  - SCANDIC FINANCE are carried out by SCANDIC FINANCE GROUP LIMITED, and ALL responsible activities are performed by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

Description of services: SCANDIC GROUP offers exclusive services worldwide. As part of the SCANDIC brand alliance, SCANDIC GROUP provides digital platforms for which it handles mediation and processing with the respective partner companies. The SCANDIC GROUP's service portfolio also includes media and digital services, payment processing and crowdfunding, real estate brokerage, security solutions, trading in financial instruments, private aviation, yachting, data centre services, technical support services for FinTech solutions and healthcare services.

Disclaimer: The content of our platform is created with the utmost care. However, we do not guarantee that the information provided is up to date, accurate or complete. As a service provider, we are responsible for our own content in accordance with general laws. The operators of external websites to which we link are solely responsible for their content. We are not liable for any direct or indirect damage resulting from the use of the information or services, unless this was caused by intent or gross negligence.

Copyright: The content published on our platform is subject to the copyright of SAR-PRC. Any form of use – in particular reproduction, editing and distribution – requires the prior written consent of SCANDIC GROUP or the respective copyright holder. Downloads and copies of content are only permitted for private, non-commercial use.

Consumer information and dispute resolution: The European Commission provides a platform for online dispute resolution (ODR platform). Consumers can use this platform for the out-of-court settlement of disputes. We are generally willing to participate in dispute resolution proceedings before a consumer arbitration board.

Note on statutory value added tax: Our services may be subject to statutory value added tax. The prices quoted include the applicable value added tax, unless otherwise stated.

Applicable law: The law of Hong Kong, Special Administrative Region of the People's Republic of China (SAR), applies, excluding the UN Convention on Contracts for the International Sale of Goods. If the contractual partner is a merchant, a legal entity under public law or a special fund under public law, the place of jurisdiction is Hong Kong, Special Administrative Region of the People's Republic of China, to the extent permitted by law.

Library of legal documents: This platform refers to our General Terms and Conditions (GTC), Privacy Policy, Compliance Statement, Corporate Governance Principles, Modern Slavery Statement and other policies applicable to the brands in the SCANDIC portfolio. These documents are part of our publicly available policies at and can be viewed via the relevant links.

Drafted, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED Hong Kong, SAR-PRC, 1 December 2025 Legal counsel: Clifford Chance, global law firm

## **AI Code of Ethics**

AI Ethics Code of SCANDIC FINANCE GROUP LIMITED and the SCANDIC Brand Ecosystem



1. Company information and cooperation structure This Code of Ethics for Artificial Intelligence (hereinafter referred to as the "AI Code of Ethics") applies to:  
SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong, SAR-PRC Telephone headquarters Switzerland, Zurich: +41 44 7979 99 – 85 Email: Commercial register:

in cooperation with SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001, United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register:

in cooperation with SCANDIC TRUST GROUP LLC IQ Business Centre, Bolsunovska Street 13–15 01014 Kyiv, Ukraine Telephone Headquarters United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60 Email: Commercial register extract:

in cooperation with LEGIER BETEILIGUNGS GMBH Kurfürstendamm 14 10719 Berlin, Federal Republic of Germany Commercial register number Berlin: HRB 57837 Telephone: +49 (0) 30 9921134 – 69 Email: Commercial register:

Legal notice: SCANDIC ASSETS FZCO, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP LLC act as non-operational service providers. All operational and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

Validity in the brand ecosystem: This AI Code of Ethics applies to the SCANDIC brand ecosystem, in particular to the following brands and services: - SCANDIC SEC - SCANDIC FLY - SCANDIC PAY - SCN - SCANDIC CARS - SCANDIC DATA - SCANDIC SETUP - SCANDIC TRUST - SCANDIC CARDS - SCANDIC ESTATE - SCANDIC YACHTS - SCANDIC HEALTH - SCANDIC FINANCE as well as all structures held or supported by SCANDIC FINANCE GROUP LIMITED.

Table of contents 1. Preamble and scope 2. Core values and guiding principles 3. Governance and responsibilities (Artificial Intelligence Ethics Committee, accountability model) 4. Legal and regulatory framework (European Union Artificial Intelligence Regulation, General Data Protection Regulation, Digital Services Act, copyright law, commercial law) 5. Risk classification and assessment of the impact of artificial intelligence 6. Data ethics and data protection (legal basis, data protection impact assessment, internet identifiers, transfers to third countries) 7. Life cycle of models and data (model life cycle, data cards, model cards) 8. Transparency, explainability and user notices 9. Human oversight and supervisory duties 10. Security, robustness and adversarial testing 11. Supply chain, human rights and fair labour 12. Bias control, fairness and inclusion 13. Generative artificial intelligence, proof of origin and labelling 14. Content, moderation and processes under the Digital Services Act 15. Domain-specific use in the SCANDIC brand ecosystem 16. Third parties, procurement and risk management of service providers 17. Operation, monitoring, emergency and recovery plans 18. Incidents and remedies (ethics, data protection, security) 19. Metrics, key performance indicators and safeguards 20. Training, awareness and cultural change 21. Implementation and roadmap (0–6 / 6–12 / 12–24 months) 22. Roles and responsibilities

matrix 23. Checklists (brief impact assessment, data release, release for commissioning)  
24. Forms and templates (model card, data card, incident report) 25. Glossary and references

1. Preamble and scope 1.1 SCANDIC FINANCE GROUP LIMITED recognises the profound importance of artificial intelligence systems for financial services, media, health, mobility, real estate, data processing and digital infrastructure. The aim of this AI Ethics Code is to create a binding framework for the responsible, legally compliant and human-centred use of artificial intelligence.

1.2 This Code applies worldwide to all artificial intelligence systems operated or managed by SCANDIC FINANCE GROUP LIMITED, including those developed, operated or used in cooperation with SCANDIC ASSETS FZCO, SCANDIC TRUST GROUP LLC or LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung.

1.3 The Code is binding for the following groups: - Employees and managers of SCANDIC FINANCE GROUP LIMITED and its affiliated companies, - External service providers, processors and suppliers, - Partner companies within the SCANDIC brand ecosystem, - Other third parties who develop, operate or provide artificial intelligence systems on behalf of or in the interests of SCANDIC FINANCE GROUP LIMITED.

1.4 The AI Ethics Code supplements existing guidelines, in particular: - Group Data Protection Policy, - Digital Services and Platform Processes Policy, - Human Rights Due Diligence and Supply Chain Policy, - Corporate Governance and Compliance Policy, - Sustainability Policy, - Statement on Combating Modern Forms of Slavery. In the event of a conflict, the stricter and more protective regulation for those affected shall always apply.

2. Core values and guiding principles 2.1 Human dignity and fundamental rights Artificial intelligence serves people, not the other way around. All artificial intelligence systems and applications must respect human dignity, fundamental rights and personal rights.

2.2 Legal compliance SCANDIC FINANCE GROUP LIMITED is committed to complying with all relevant national and international standards. , this includes, in particular, the European Union's Artificial Intelligence Regulation, the European Union's General Data Protection Regulation, the European Union's Digital Services Act, relevant copyrights, ancillary copyrights and personal rights, as well as industry-specific regulations.

2.3 Responsibility and accountability For each artificial intelligence system, a clearly designated responsible person is appointed who is accountable for the purpose, risk assessment, documentation and ongoing monitoring.

2.4 Proportionality The design and use of artificial intelligence must always be proportionate. The higher the risk to data subjects, the stricter the requirements for justification, transparency, oversight and safeguards.

2.5 Transparency and explainability Users should be informed when they interact with artificial intelligence systems or when content has been generated or significantly influenced by artificial intelligence. The functioning of the systems must be explained in

understandable language, insofar as this is compatible with the protection of trade secrets and security interests.

2.6 Fairness and inclusion Artificial intelligence systems must not create or reinforce unjustified disadvantages. Particular attention must be paid to vulnerable groups and to avoiding structural discrimination.

2.7 Security and resilience Artificial intelligence systems must be robust against malfunctions, attacks and manipulation. Mechanisms for error detection, safe shutdown and recovery shall be provided.

2.8 Sustainability The development and operation of artificial intelligence systems shall take into account environmental, social and corporate governance aspects. Energy-efficient processes, resource-saving infrastructures and responsible use of computing capacities shall be preferred.

3. Governance and responsibilities 3.1 Committee for Ethics in Artificial Intelligence SCANDIC FINANCE GROUP LIMITED is establishing a committee for ethics in artificial intelligence. This committee is interdisciplinary and includes representatives from the following areas, among others:

- Technology and Development,
- Legal and compliance,
- Data protection,
- Information security,
- Editorial and Product Management,
- Human resources,
- Relevant business areas such as financial services, health and media.

Tasks of the Committee for Ethics in Artificial Intelligence: - Updating the AI Ethics Code and associated guidelines, - Deciding on fundamental issues relating to the use of artificial intelligence, - Approving high-risk systems, - Assessing incidents with ethical relevance, - Annual review of the overall risk profile of artificial intelligence systems within the company.

3.2 Responsibility model A responsibility model is defined for all activities in the life cycle of artificial intelligence systems. It specifies: - who is responsible for execution, - who bears ultimate accountability, - who is to be involved in an advisory capacity, - who is to be informed and in what form.

3.3 Documentation The structure of the committee, the role descriptions and the decision-making processes of the committee for ethics in artificial intelligence are documented in writing. Changes require a formal resolution and are communicated transparently.

4. Legal and regulatory framework 4.1 European Union Artificial Intelligence Regulation SCANDIC FINANCE GROUP LIMITED aligns its internal procedures with the European Union Artificial Intelligence Regulation. This includes, among other things:

- Classification of systems into prohibited practices, high-risk systems, limited-risk systems and minimal-risk systems
- Compliance with requirements for quality management, documentation, logging and human oversight
- Technical and organisational measures to ensure security, transparency and traceability.

4.2 European Union General Data Protection Regulation All processing relevant to data protection law must be aligned with the European Union's General Data Protection Regulation. This includes in particular: - Defining and documenting legal bases, - Observing special categories of personal data, - Implementing data protection through design and data protection-friendly default settings, - Carrying out data protection impact assessments, - Safeguarding the rights of data subjects.

4.3 European Union Digital Services Act Digital services related to the European Union are subject to the provisions of the European Union Digital Services Act. This includes in particular: - clear reporting channels for illegal content, - complaint procedures and appeal options, - transparency reports and risk-based assessments.

4.4 Copyright, ancillary copyright and personal rights When using artificial intelligence to create, process or distribute content, copyright, ancillary copyright and personal rights are taken into account comprehensively. Licence chains are documented and verified.

4.5 Industry-specific standards Industry-specific standards, such as financial market regulation, health law, aviation law, maritime law, telecommunications law and media law, must also be observed. This includes relevant supervisory requirements and professional standards.

5. Risk classification and assessment of the impact of artificial intelligence 5.1 Risk classification Each artificial intelligence system is assigned a risk class prior to its introduction:
  - Prohibited practices: systems that may not be operated
  - High-risk systems: systems with a significant impact on safety, health, fundamental rights or living conditions.
  - Systems with limited risks: systems with transparency requirements and manageable risk potential.
  - Systems with minimal risks: simple support functions with a low risk profile.

5.2 Impact assessment A structured assessment of the impact of artificial intelligence includes: - Description of the purpose and functions, - Analysis of the groups affected, - Legal and ethical assessment, - Identification of risks in the areas of law, ethics, safety, bias and the environment, - Definition and documentation of protective measures, - Decision on approval, restriction or rejection of the system.

5.3 Recurring reassessment Artificial intelligence systems are reassessed when significant changes are made and at regular intervals. High-risk systems are reviewed at least once a year.

6. Data ethics and data protection 6.1 Data minimisation and purpose limitation Only data that is absolutely necessary for the fulfilment of the respective purpose is

processed. Any change of purpose requires a new legal review and, if necessary, notification of the data subjects.

**6.2 Transparency towards data subjects** Data subjects are informed in a clear and comprehensible manner about the nature, scope, purpose and legal basis of processing within the framework of artificial intelligence systems. This also includes information on automated decision-making, profiling and the significance and intended effects for the data subject.

**6.3 Technical and organisational measures** SCANDIC FINANCE GROUP LIMITED implements appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of data. This includes in particular: - Access and rights concepts, - Encryption, pseudonymisation and anonymisation, - Logging of accesses and changes, - Separate data storage for development, test and production environments.

**6.4 Internet identifiers and tracking** The use of Internet identifiers such as cookies and similar technologies in connection with artificial intelligence systems is based on the principle of data minimisation. Consent is obtained and documented where necessary, and options for revocation are made simple.

**6.5 Transfer to third countries** If personal data is transferred to countries outside the European Economic Area, appropriate safeguards are put in place. The actual legal situation in the recipient country is assessed and, if necessary, compensated for by additional protective mechanisms.

- 7. Life cycle of models and data** **7.1 Life cycle of data** The data life cycle comprises:
- Collection and procurement,
  - Preparation and cleansing,
  - Labelling and quality assurance,
  - Use and analysis,
  - archiving and deletion.

Each phase is documented and responsibilities are assigned.

**7.2 Life cycle of the models** The model life cycle comprises: - Problem definition and objective setting, - Selection of model architecture, - Training and fine-tuning, - Testing and validation, - Release and commissioning, - Monitoring and maintenance, - Adaptation, retraining or decommissioning.

**7.3 Data cards and model cards** Data cards and model cards are created for central data sets and models. These contain information on origin, representativeness, quality characteristics, known biases, intended uses, limitations and risks, as well as the persons responsible.

- 8. Transparency, explainability and user information** **8.1 Labelling of artificial intelligence systems** Artificial intelligence systems are clearly labelled for users. This can take the form of notices, symbols or brief explanations.

8.2 Explainable results Where possible, understandable explanations shall be provided for decision-supporting or decision-replacing systems. These shall contain information about which factors have contributed significantly to the result.

8.3 Feedback and correction mechanisms Users shall be provided with easily accessible options for questioning results, reporting errors and suggesting corrections. Incoming notifications shall be recorded, reviewed and responded to in a structured manner.

9. Human oversight and supervisory duties 9.1 Human ultimate responsibility In all critical areas, the ultimate decision-making responsibility remains with humans. Artificial intelligence systems must not be allowed to make independent decisions with serious consequences for those affected in an uncontrolled manner.

9.2 Supervision and intervention options Mechanisms are established that enable responsible persons to: - check results, - pause or shut down systems, - make alternative decisions.

9.3 Multiple-eyes principle In sensitive areas, such as editorial reporting, financial decisions and healthcare, a multiple-eyes principle is provided for. Decisions are reviewed by several qualified persons.

10. Security, robustness and adversarial testing 10.1 Threat analyses Threat analyses are carried out for artificial intelligence systems, taking into account attacks on input data, models and outputs.

10.2 Adversarial testing Systems are regularly subjected to simulated attacks and abuse scenarios in order to identify and remedy vulnerabilities.

10.3 Security measures Technical protective measures include, among others: - Input and output checks, - Limitation of queries and resources, - Monitoring of suspicious patterns, - Emergency mechanisms for rapid response.

11. Supply chain, human rights and fair labour 11.1 Human rights due diligence SCANDIC FINANCE GROUP LIMITED is committed to respecting human rights throughout its supply chain. Service providers are assessed for their compliance with fundamental labour, social and environmental standards.

11.2 Modern forms of slavery Any form of forced labour, child labour or human trafficking is firmly rejected. Suspected cases are investigated and, if necessary, business relationships are terminated.

11.3 Protection Whistleblowers who report abuses in good faith are protected from discrimination. The confidentiality of their identity is maintained to the extent legally possible.

12. Prejudice control, fairness and inclusion 12.1 Review of data sets Data sets are analysed to identify biases that could lead to unfair treatment of certain groups.

12.2 Fair use of models Models are designed and tested to ensure fair results. Differences in the degree of impact on different groups are documented and, where possible, reduced.

12.3 Inclusive design User interfaces and communication channels are designed to be inclusive. Accessibility and multilingualism are promoted to enable access for all groups.

13. Generative artificial intelligence, proof of origin and labelling 13.1 Labelling of generated content Content that has been created predominantly by generative artificial intelligence processes is identified as such, particularly in journalistic contexts, in advertising, and in financial or health information.

13.2 Proof of origin Where technically possible, watermarks, signatures or metadata shall be used to make the origin of content traceable.

13.3 Third-party rights When training and using generative systems, the rights of authors and holders of ancillary copyrights shall be respected. Unauthorised use is prohibited.

14. Content, moderation and processes in accordance with the Digital Services Act 14.1 Reporting channels SCANDIC FINANCE GROUP LIMITED has set up easily accessible reporting channels for illegal or abusive content. Reports are reviewed and processed promptly.

14.2 Complaints procedure There are complaints and appeal procedures in place that allow users to question and review decisions about content or accounts.

14.3 Transparency reports Transparency reports are published at regular intervals, providing information on how reported content is handled, the use of artificial intelligence systems for moderation, and measures taken to mitigate risk.

15. Domain-specific use in the SCANDIC brand ecosystem 15.1 News and media In news and media offerings, artificial intelligence systems serve as tools for research, translation, summarisation and moderation. Editorial responsibility remains with journalistically trained individuals.

15.2 Data and computing centre services SCANDIC DATA provides artificial intelligence infrastructures that ensure client separation, encryption, key management and comprehensive monitoring.

15.3 Healthcare In healthcare applications, artificial intelligence systems support professionals in diagnosis and therapy decisions, but do not replace them. Final decisions remain with qualified healthcare professionals.

15.4 Aviation and maritime Artificial intelligence systems are used in aviation and yacht services to optimise routes, maintenance and customer experience. Safety-related decisions remain the responsibility of pilots and captains.

15.5 Real estate Real estate applications use valuation models that take transparent criteria into account. Discrimination in renting or selling is actively avoided.

15.6 Financial services, payment transactions, trade, trust and digital assets Artificial intelligence systems assist in the detection of fraud, compliance with anti-money laundering and counter-terrorist financing regulations, risk management and market surveillance. Decisions with a significant impact on customers are justified in a comprehensible manner.

15.7 Mobility and vehicles Mobility and vehicle services use personalised offers and assistance functions that respect privacy and security. Movement data is only used under strict protection conditions.

16. Third parties, procurement and risk management of service providers 16.1 Review prior to cooperation Before cooperating with third-party providers of artificial intelligence components, their security level, data protection standards, data processing locations, certifications and subcontractor structures are reviewed.

16.2 Contractual provisions Contracts with third-party providers contain provisions on: - Responsibilities, - Inspection and audit rights, - Transparency obligations in the event of changes and incidents, - Performance indicators for service quality, - Termination rights for good cause.

16.3 Ongoing monitoring The performance and risk profile of third-party providers are monitored regularly. Significant deviations lead to corrective measures or, if necessary, to the termination of the cooperation.

17. Operation, monitoring, emergency and recovery plans 17.1 Operation and monitoring Artificial intelligence systems in productive use are continuously monitored. This includes:

- technical stability and availability,
- result quality and error rates,
- anomalies in usage behaviour,
- indications of security-related incidents.

17.2 Emergency management Plans are in place for dealing with failures and security incidents. These include: - defined recovery times, - communication channels, - escalation levels, - regular exercises and updates.

17.3 Configuration and secret management Configurations and confidential information are centrally managed, protected and regularly reviewed. Access is strictly granted according to the principle of minimum required rights.

18. Incidents and Remedial Action (Ethics, Data Protection, Security)

18.1 Types of incidents Incidents are divided into at least the following categories: - ethical incidents, - data protection incidents, - security incidents.

18.2 Reporting and processing procedures Clear reporting chains and processing procedures exist for all types of incidents. These regulate: - who receives incidents, - how quickly a response is required, - which departments are to be involved, - how the root cause analysis is carried out.

18.3 Documentation and learning Every incident is documented. Lessons are learned from incidents and incorporated into guidelines, training courses and technical measures.



19. Metrics, performance indicators and safeguards 19.1 Metrics for control  
SCANDIC FINANCE GROUP LIMITED defines metrics to monitor compliance with this AI Ethics Code. These include, for example:

- Number and proportion of artificial intelligence systems evaluated
- Processing times for complaints,
- Frequency and severity of incidents
- Training rates.

19.2 Metrics for fairness and quality Appropriate metrics are defined to monitor the fairness, quality and stability of models. Differences in error rates between groups are identified and evaluated.

19.3 Sustainability metrics Key figures on energy consumption, computing resource utilisation and other environmental aspects are collected and included in decisions on the selection of models and infrastructures.

20. Training, awareness raising and cultural change 20.1 Mandatory training  
Employees in relevant roles regularly participate in training courses that teach the basics, opportunities and risks of artificial intelligence. In addition, special training courses are offered on data protection, information security and industry-specific topics.

20.2 Awareness-raising measures Awareness of ethical issues relating to artificial intelligence is raised through guidelines, internal communication campaigns, specialist forums and exchange formats.

20.3 Role of managers Managers act as role models. They are responsible for actively demanding and promoting compliance with this AI Code of Ethics.

21. Implementation and roadmap 21.1 Period from zero to six months

- Complete survey of all use cases of artificial intelligence
- Establishment and commencement of work by the Committee for Ethics in Artificial Intelligence
- Introduction of the assessment of the impact of artificial intelligence for new systems,
- Start of training programmes for key roles.

21.2 Period from six to twelve months - Expansion of the assessment of existing systems, - Creation and introduction of uniform data and model maps, - Definition of binding responsibility models, - First internal transparency reports.

21.3 Period of twelve to twenty-four months - Alignment of the management system with relevant standards, - Preparation for possible external audits, - Integration into sustainability reporting, - Regular review and further development of this AI Ethics Code.

22. Roles and responsibility matrix 22.1 Application manager Responsible for the technical control and target achievement of an artificial intelligence system.

22.2 Model manager Responsible for data, training, evaluation and documentation of the model.

22.3 Data protection officer Advises on and monitors all issues relating to data protection.

22.4 Head of Information Security Responsible for security concepts, threat analyses and coordination of security incidents.

22.5 Responsible editor Ensures compliance with editorial and media ethics standards in media offerings.

22.6 Service Manager Responsible for the technical operation, monitoring and maintenance of an artificial intelligence system.

22.7 Procurement Manager Evaluates third-party providers and drafts contracts with a view to security, data protection and compliance.

23. Checklists 23.1 Brief assessment of the impact of artificial intelligence

- Is the purpose of the system clearly defined?
- What is the legal basis for data processing?
- Which groups are affected?
- What are the risks in terms of law, ethics, security, bias and the environment?
- What safeguards are planned?
- How is human oversight organised?

23.2 Data release checklist - Is the data source legitimate and trustworthy? - Is the scope of the data minimised? - Are retention periods defined? - Are there appropriate access controls in place? - Are transfers to third countries properly secured?

23.3 Checklist for release for commissioning - Are data cards and model cards complete? - Is there an assessment of the impact of artificial intelligence? - Have security and data protection measures been implemented and tested? - Is there a monitoring concept in place? - Has training been provided for the relevant roles?

24. Forms and templates 24.1 Model card Includes, among other things:

- Description of the model and its purpose,
- types of data used,
- training procedures,
- Measured variables and target values,
- known limitations and risks,
- responsible persons and contact information.

24.2 Data card Includes, among other things: - Origin and licensing status of the data, - Quality characteristics, - Representativeness, - Known distortions, - Restrictions on use.

24.3 Incident report Includes, among other things: - Description of the incident, - Affected systems and persons, - Immediate measures, - Cause analysis, - Long-term remedial measures.

25. Glossary and references Artificial intelligence: Systems that generate content, predictions, recommendations or decisions that were previously reserved for human intelligence.

High-risk system: Artificial intelligence system with a significant impact on the safety, health, fundamental rights or living conditions of affected persons.

Assessment of the impact of artificial intelligence: Structured procedure for analysing the legal, ethical, safety-related, fairness-related and environmental impacts of an artificial intelligence system.

Human oversight: Planned and empowered role of individuals who monitor, understand, question and, if necessary, take corrective action in relation to artificial intelligence systems.

Adversarial testing: Targeted simulation of attacks and abuse scenarios to identify and remedy vulnerabilities in artificial intelligence systems.

Accountability model: Model for the clear allocation of responsibilities, accountability, advisory roles and information obligations.

Key references: - European Union Artificial Intelligence Regulation, - European Union General Data Protection Regulation, - European Union Digital Services Act, - Organisation for Economic Co-operation and Development Guiding Principles for Trustworthy Artificial Intelligence, - Framework of the United States National Institute of Standards and Technology for the management of risks in artificial intelligence, - Relevant international standards on management systems for artificial intelligence, - Internal guidelines of SCANDIC FINANCE GROUP LIMITED on data protection, digital services, human rights and supply chains, corporate governance, sustainability and combating modern forms of slavery.

Final provision: This AI Code of Ethics is an integral part of SCANDIC FINANCE GROUP LIMITED's compliance framework. Violations may result in employment, civil and criminal consequences. The management expressly commits to its implementation, ongoing development and effective application in all business areas worldwide. Drafted, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED Hong Kong, SAR-PRC, 1 December 2025

## **Human Rights Policy**

Human Rights Policy and Statement of Principles of SCANDIC FINANCE GROUP LIMITED and the SCANDIC Brand Ecosystem

2. Information on the responsible companies This Human Rights Policy and Statement of Principles applies to the following companies (hereinafter collectively referred to as the "SCANDIC FINANCE GROUP LIMITED Group"):

SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong, SAR / PRC Telephone Headquarters Switzerland, Zurich: +41 44 7979 99 – 85 Email: Commercial Register:

in cooperation with: SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001, United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register: in cooperation with: SCANDIC TRUST GROUP LLC IQ Business Centre, Bolsunovska Street 13–15 Kyiv — 01014, Ukraine Telephone Headquarters

United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60  
Email: Commercial register extract: in cooperation with: LEGIER BETEILIGUNGS  
GMBH Kurfürstendamm 14 10719 Berlin, Federal Republic of Germany Commercial  
register number Berlin: HRB 57837 Telephone: +49 (0) 30 9921134 – 69 Email:  
Commercial register:

Legal notice: SCANDIC ASSETS FZCO, LEGIER BETEILIGUNGS GMBH and  
SCANDIC TRUST GROUP LLC act as non-operational service providers. All operational  
and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED,  
Hong Kong, Special Administrative Region of the People's Republic of China.

This policy applies to the SCANDIC brand ecosystem, in particular to the following  
brands and services:

SCANDIC SEC

SCANDIC FLY

SCANDIC PAY

SCN

SCANDIC CARS

SCANDIC DATA

SCANDIC SETUP

SCANDIC TRUST

SCANDIC CARDS

SCANDIC ESTATE

SCANDIC YACHTS

SCANDIC HEALTH

SCANDIC FINANCE

as well as for all structures held or supported by SCANDIC FINANCE GROUP LIMITED  
in the financial, trust, payment, media and investment sectors.

## 1. Foreword, objectives and commitment

SCANDIC FINANCE GROUP LIMITED and its affiliated brands recognise universal  
human rights as a binding framework for their global activities. Respect for human  
dignity and civil, political, economic, social and cultural rights is a fundamental  
prerequisite for our business activities and our claim to be a responsible, sustainable  
company.

We are committed to

implement the United Nations Guiding Principles on Business and Human Rights (UN  
Guiding Principles on Business and Human Rights)

continuously identify, avoid, mitigate and, where they occur, adequately remedy human rights risks in all global legal transactions in which we are involved,

design our products and services in such a way that they do not contribute to or support human rights violations,

pursue a consistent zero-tolerance policy towards forced labour, child labour, human trafficking, torture, exploitative working conditions, discrimination and other serious human rights violations.

This human rights policy specifies our existing compliance principles, our statement on the prevention of slavery and modern exploitation ("Modern Slavery Statement") and our internal guidelines on data protection, information security, anti-corruption, money laundering prevention and whistleblower protection.

## 2. Scope and framework of application 2.1 Personal and material scope

This human rights policy applies:

Company-wide for:

SCANDIC FINANCE GROUP LIMITED as the entity responsible for operations,

SCANDIC ASSETS FZCO, SCANDIC TRUST GROUP LLC and LEGIER  
BETEILIGUNGS GMBH as non-operational service providers,

all brands of the SCANDIC brand ecosystem as listed above.

For all persons working within our sphere of influence:

Members of the management and governing bodies,

all employees (permanent, temporary, part-time and full-time staff, temporary workers, interns),

service providers, consultants and other persons working on behalf of or on the instructions of the SCANDIC FINANCE GROUP LIMITED group.

For all relevant business relationships, as far as legally and factually possible:

suppliers,

subcontractors,

distribution partners,

other business partners, including financial intermediaries.

## 2.2 Reference to international and national standards

We strive to structure and continuously adapt our human rights due diligence in accordance with the following frameworks:

United Nations Guiding Principles on Business and Human Rights,

Universal Declaration of Human Rights,

International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights,

Core labour standards of the International Labour Organisation (ILO core standards),

OECD Guidelines for Multinational Enterprises,

Relevant laws on corporate due diligence in supply chains, including the German Supply Chain Due Diligence Act,

Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (whistleblower protection),

Relevant data protection and privacy regulations (e.g. General Data Protection Regulation of the European Union, relevant standards in the Special Administrative Region of the People's Republic of China Hong Kong and other jurisdictions).

Where national regulations fall short of these standards, the SCANDIC FINANCE GROUP LIMITED association strives to apply the higher human rights standards within the limits of what is legally permissible.

### 3. Principles and red lines 3.1 Basic principles

The SCANDIC FINANCE GROUP LIMITED association is particularly committed to:

Respect for the human dignity of every person

non-discrimination, regardless of gender, origin, skin colour, nationality, language, religion or belief, sexual orientation, disability, age, political or trade union activity,

Respect for freedom of association and the right to collective bargaining

prohibition of forced and child labour, human trafficking and modern slavery,

Safe, healthy and dignified working conditions,

Protection of privacy, personal data and digital rights

Respect for freedom of expression, press freedom and freedom of assembly, as far as our sphere of influence extends.

**3.2 Red lines (no-go areas)** The SCANDIC FINANCE GROUP LIMITED association does not enter into business relationships or terminates them if, despite reasonable influence, the following exists or cannot be credibly remedied:

Use of our products or services to commit serious human rights violations

Participation in illegal mass surveillance that is not controlled by the rule of law or in secret programmes that systematically undermine civil liberties,

Forced labour, child labour, human trafficking or other forms of modern slavery, systematic torture, cruel, inhuman or degrading treatment,

demonstrable involvement in ethnic cleansing, apartheid, genocide or comparable serious international crimes,

continued destruction of the livelihoods of indigenous communities without adequate consultation and compensation,

sanctioned individuals or organisations, as well as actors with documented serious violations who have not demonstrated credible remediation.

#### 4. Governance, organisation and responsibilities 4.1 Overall responsibility of the management bodies

The management and supervisory bodies of SCANDIC FINANCE GROUP LIMITED bear overall responsibility for this human rights policy.

They approve the annual implementation and improvement plans, receive regular reports and make decisions on particularly high-risk or strategically relevant cases.

4.2 Operational responsibilities The following roles and committees are established for implementation:

Chief Compliance and Human Rights Officer (CCHRO)

Overall coordination of human rights due diligence obligations

responsibility for risk analysis, prevention and remedial measures,

Annual reporting and recommendation of improvement measures,

Interface with data protection officers, information security, money laundering prevention and internal audit.

Human Rights, Privacy and Ethics Committee (HRPEC)

Interdisciplinary committee (compliance, legal, purchasing, human resources, IT security/data protection, product management, operations, communications),

evaluation of high-risk cases, dual-use applications and sensitive projects,

Deciding on "go/no-go" for complex customer, country or sector constellations,

Escalation of special cases to management.

External Advisory Board for Human Rights and Civil Liberties

Independent experts from the fields of human rights, data protection, financial market regulation and civil society

Advice on difficult decisions (e.g. dual-use risks, borderline cases in cooperation with state actors),

Support in aligning with international best practices.

Functional officers in the business areas

Designated contact persons in the SCANDIC PAY, SCANDIC FLY, SCANDIC ESTATE, SCANDIC DATA, SCANDIC SEC brands, etc.

Responsibility for implementing policy in the respective processes, products and supply chains.

4.3 Reporting culture ("speak up") and role model function The management bodies promote a corporate culture in which:

the reporting of violations is expressly encouraged and protected,

no reprisals against whistleblowers are tolerated,

managers act as role models by exemplifying and actively supporting ethical behaviour.

## 5. Human rights due diligence processes

### 5.1 Risk analysis

A systematic risk analysis is carried out at least once a year and on an ad hoc basis (e.g. market entry into new countries, new product categories, changes in the geopolitical situation):

Identification of human rights risks in our own business activities, in products and services, and in the supply and value chain.

Assessment according to severity, probability of occurrence and potential for influence,

Special consideration is given to vulnerable groups: children, migrants, indigenous populations, human rights defenders and journalists.

The results are incorporated into risk registers, action plans and portfolio and customer scoring.

5.2 Prevention and risk mitigation We take the following measures, among others, to avoid and mitigate risks:

Integration of "human rights by design" and "privacy by design" into the design of products and services (e.g. payment, data, media and security solutions)

Technical and organisational protective measures (access control, logging, data minimisation, security testing of systems)

Human rights design reviews for new or modified products

Clear codes of conduct and supplier codes with human rights requirements

contractual assurances, audit and information rights,

training and awareness programmes for employees and relevant business partners.

5.3 Assessment of new customers, products and businesses Before entering into a business relationship or introducing new products, the following are carried out:



Customer and supplier checks (know-your-customer, anti-money laundering and sanctions checks, transparency of ownership structure, politically exposed persons),

assessment of the intended use and end users, particularly for financial, payment, data, aviation, security and media products,

Assessment of country-specific risks (conflict areas, systemic rule of law deficits, known human rights issues),

Assignment of risk categories, decision on enhanced due diligence and, if necessary, HRPEC approval.

5.4 Reactive measures, remedies and exit strategies If risks or violations become known, graduated measures apply:

Investigation of the facts, hearing of those affected, involvement of relevant departments.

Immediate measures, for example temporary suspension of deliveries or services if there is an acute risk of damage.

Remedial agreements with clear deadlines (corrective measures, training, organisational adjustments).

In the event of serious violations and a lack of cooperation: suspension or termination of the business relationship (exit strategy) and, if necessary, cooperation with authorities.

5.5 Effectiveness monitoring, documentation and reporting

Regular review of the effectiveness of preventive and remedial measures.

documentation of all essential steps (risk assessment, decisions, measures and results),

regular reports to management and supervisory bodies,

Preparation of an annual report on human rights due diligence, modern slavery and supply chain risks, adapted to the respective legal requirements of the relevant jurisdictions.

## 6. Business partner and customer due diligence (including "no-go" rules)

### 6.1 Standard checks

Identity and ownership checks on customers, suppliers, distribution partners and trust structures,

Sanctions and embargo checks, checks for politically exposed persons,

Checks on sources of financing and beneficial owners.

### 6.2 Enhanced due diligence for high-risk constellations

Enhanced due diligence obligations apply in particular to:

business relationships in countries or regions with systemic human rights risks,

Sectors with increased risk (security and surveillance technologies, raw material extraction, construction, transport to crisis areas),

products and services with dual-use risk (civilian and potentially military or repressive use),

Transactions with particularly vulnerable groups (e.g. small investors, refugees, people in precarious employment).

### 6.3 "No-go" criteria

The SCANDIC FINANCE GROUP LIMITED network does not enter into business relationships and terminates them if:

end users demonstrably use or intend to use our products for serious human rights violations,

our solutions would become an integral part of illegal mass surveillance programmes,

Partners are proven to engage in forced labour, child labour or human trafficking and do not take credible, verifiable measures to remedy the situation.

business partners or end users are included on relevant sanctions lists or are subject to embargo measures binding under international law,

there is no way to reduce the risk to an acceptable level.

## 7. Product-specific human rights commitments (excerpt) 7.1 SCANDIC TRADE / SCN / SCANDIC FINANCE

Protection of investors through transparent disclosure of risks,

Appropriate suitability and appropriateness checks, especially for complex products

avoidance of abusive structures (e.g. for money laundering or terrorist financing),

Compliance with relevant financial market, consumer and data protection regulations.

### 7.2 SCANDIC PAY / SCANDIC CARDS

Transparent fee and charge models,

special consideration for vulnerable customer groups (e.g. people with low financial literacy),

Measures to prevent fraud, identity theft and financial exploitation,

barrier-free complaint and support processes.

### 7.3 SCANDIC FLY / SCANDIC CARS / SCANDIC YACHTS

Prioritisation of the safety, health and dignity of all passengers and crew members,

Compliance with working hours and rest periods, fair employment conditions for staff,

zero tolerance for harassment, discrimination or violence on board,

Compliance with international aviation and maritime law standards, flag and port state controls.

#### 7.4 SCANDIC ESTATE

Respect for housing and land rights,  
fair, transparent contract and rental conditions,  
Avoidance of forced evictions without due process of law,  
consideration of accessibility and humane living conditions.

#### 7.5 SCANDIC DATA

Special protection of freedom of the press and freedom of expression  
Protection of journalists, sources and editorial independence  
separation of editorial content and advertising,  
Responsible data collection and processing in media and IT services.

#### 7.6 SCANDIC SEC

Security services based on proportionality and de-escalation,  
Training of personnel in human rights-compliant behaviour,  
Avoidance of assignments that would disproportionately restrict democratic rights and freedoms.

### 8. Employee rights and working conditions

The SCANDIC FINANCE GROUP LIMITED association is committed to all employees to:

Freedom of association and the right to collective bargaining within the framework of the respective legal system,

equal treatment and equal opportunities,

fair pay and working conditions,

Healthy working conditions and accident prevention

effective prevention and prosecution of discrimination, harassment, bullying and gender-based violence,

prohibition of all forms of forced labour, debt bondage or involuntary labour,

special protective measures for minors (no employment of children below the legal minimum age, strict limits on hazardous activities).

Training on human rights, anti-discrimination, diversity, data protection and information security is a mandatory part of the annual training programme.

## 9. Data protection, privacy and civil liberties

In the area of data processing and technology development, we are guided by the principles of

data minimisation and purpose limitation,

privacy by design and security by design,

transparent information about data processing,

Appropriate technical and organisational measures to protect against unauthorised access, loss or misuse

Careful consideration in automated decisions, with the possibility of human review in cases of significant impact on data subjects.

Where our services may have an impact on freedom of expression, freedom of the press and freedom of assembly (e.g. media, data or security products), these rights are explicitly included in the risk analysis and special protective measures are developed.

## 10. Complaint mechanisms, whistleblower system and access to redress

### 10.1 Complaint channels

The SCANDIC FINANCE GROUP LIMITED association is setting up multilingual, accessible complaint channels that are open to employees, business partners and external stakeholders, including:

a secure online reporting portal (anonymous reporting possible),

dedicated email addresses and postal addresses,

an ombudsman service or hotline, where applicable.

These channels can be used to report human rights violations, legal violations, violations of internal guidelines and other misconduct.

### 10.2 Protection of whistleblowers

Strict prohibition of any reprisals against persons who report in good faith,

Confidentiality of the identity of whistleblowers,

Documentation and appropriate processing of all reports.

Feedback to whistleblowers within the legally permissible framework.

### 10.3 Access to redress

If the SCANDIC FINANCE GROUP LIMITED group contributes to a human rights violation through its own actions or omissions, or through our failure to exert appropriate influence, measures for redress and reparation will be considered, for example:

Correction of the affected service or contractual relationship,

financial or other compensation where appropriate,

structural measures to prevent future violations (process, organisational or technical changes),

Measures against business partners (including termination of the business relationship).

#### 11. Implementation, training and embedding in processes

The human rights policy is integrated into internal guidelines, process descriptions and contract templates.

New employees receive an introduction to human rights principles as part of their onboarding, and existing employees receive regular training.

Role- and function-specific training (e.g. purchasing, sales, product development, compliance, human resources) deepens the relevant aspects.

Compliance with the requirements is part of target agreements, performance appraisals and audit programmes.

#### 12. Monitoring, key performance indicators and reporting

To monitor effectiveness, the following key performance indicators, among others, are collected and evaluated:

Proportion of business areas and supply chains with current risk analysis

Number, type and processing time of complaints and suspected cases

Percentage of audits carried out on business partners and corrective measures taken

Participation rates in training courses

Progress in implementing defined improvement measures.

The results are incorporated into:

an annual report on human rights due diligence, modern slavery and supply chain responsibility,

quarterly reports to management and supervisory bodies,

any published statements in accordance with statutory transparency requirements.

#### 13. Dialogue, cooperation and further development

The SCANDIC FINANCE GROUP LIMITED network strives for open dialogue with:  
affected parties and their representatives,

non-governmental organisations,

Industry initiatives and standard setters,

academia and the professional community

in order to learn from experience, understand expectations and continuously improve our human rights policy.

#### 14. Escalation and consequences of violations

Violations of this human rights policy and the guidelines derived from it may have consequences, depending on their severity and culpability:

labour law measures against employees,

warnings, conditions, suspension or termination of business relationships with suppliers, customers or other partners,

assertion of claims for damages,

support for government law enforcement or supervisory authorities, where appropriate and legally required.

#### 15. Entry into force, review and publication

This Human Rights Policy:

comes into force upon its adoption by the management of SCANDIC FINANCE GROUP LIMITED,

will be reviewed at least once a year and as required (e.g. in the event of significant changes in the legal situation, business model or risk situation) and amended as necessary,

will be communicated and made available to employees, business partners and the public in an appropriate manner (e.g. via websites and internal platforms).

#### **A: Minimum requirements for suppliers and business partners**

Compliance with laws and standards

Compliance with all relevant national laws,

Respect for the UN Guiding Principles on Business and Human Rights, the ILO core labour standards and the relevant requirements of supply chain law.

Labour and social standards

Prohibition of forced, child and compulsory labour

no discrimination, harassment or abuse,

safe and healthy working conditions,

fair pay and working hours that comply with the law.

Complaints procedure

Establishment of effective, accessible and, where possible, anonymous channels

protection against reprisals,

Cooperation with the SCANDIC FINANCE GROUP LIMITED network in investigations.

Transparency

Disclosure of relevant production sites, subcontractors and supply chain stages,

Appropriate documentation and cooperation in audits.

Data and privacy protection

Protection of personal data in accordance with applicable data protection laws,

implementation of privacy-by-design elements where appropriate.

Escalation and remedy

Commitment to implement agreed corrective measures within clearly defined deadlines,

Acceptance that, in the event of insufficient remedy, the business relationship may be terminated on human rights grounds.

#### **B: "Go/No-Go" decision grid**

A decision grid is used to structure decisions in high-risk cases, which includes the following elements, among others:

Risk screening

Sector, country, customer type, end use, financing structure,

human rights history of the potential partner.

Risk assessment

Classification into risk categories (low, medium, high, unacceptable),

consideration of the SCANDIC FINANCE GROUP LIMITED network's potential influence.

Protective measures

Contractual requirements, technical and organisational controls,

increased monitoring, regular reviews and audits.

Residual risk

Assessment of whether remaining risks are acceptable,

if the residual risk is unacceptable: no-go decision or – in the case of existing relationships – an orderly exit plan.

Documentation

Written record of the assessment and decision,

involvement of the HRPEC and the external advisory board, if applicable.

With this comprehensive human rights policy, SCANDIC FINANCE GROUP LIMITED, together with its cooperating companies and all brands in the SCANDIC brand ecosystem, reaffirms its commitment to acting in a manner that complies with human rights, is transparent and responsible in global legal transactions, and to continuously fulfilling and further developing its due diligence obligations. Drafted, signed and approved:

The Management Board of SCANDIC FINANCE GROUP LIMITED  
Hong Kong, SAR-PRC, 1 December 2025

## **Modern Slavery Act**

Statement on the prevention of slavery and human exploitation

### Introduction

This statement summarises the measures taken by the brands of the SCANDIC Group to comply with the requirements of the Modern Slavery Act 2015, by: - SCANDIC FLY

- SCANDIC SEC
- SCANDIC PAY
- SCN
- SCANDIC DATA
- SCANDIC CARS
- SCANDIC SETUP
- SCANDIC TRUST
- SCANDIC CARDS
- SCANDIC ESTATE
- SCANDIC YACHTS
- SCANDIC HEALTH
- SCANDIC FINANCE

The aforementioned ECO-System brands are represented by: SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong/ SAR / PRC Phone HQ - Switzerland, Zurich: +41 44 7979 99 – 85 Mail: Commercial Register:

in cooperation with: SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001 / United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register:



in cooperation with: SCANDIC TRUST GROUP LLC IQ Business Centre Bolsunovska Street 13-15 Kyiv — 01014 / Ukraine Telephone HQ – United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60 Email: Commercial register:

in cooperation with: LEGIER BETEILIGUNGS GMBH Kurfürstendamm 14 10719 Berlin / Federal Republic of Germany Commercial register Berlin: HRB 57837 Phone: +49 (0) 30 9921134 – 69 Email: Commercial register:

Legal notice: SCANDIC ASSETS FZCO, LEGIER Beteiligungs GmbH and SCANDIC TRUST GROUP LLC act as non-operational service providers. All operational and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

Overarching goal: SCANDIC FINANCE GROUP LIMITED is committed to best corporate practices and ethical values. We act with integrity and ethics in all business relationships and processes, in line with our corporate values and guidelines. We also take all reasonable measures to ensure that members of our supply chains also comply with these standards. This includes, in particular, the prevention of modern slavery and human trafficking. Our employees are expected to report concerns regarding non-compliance with our values and policies through established reporting channels. The management and board of SCANDIC FINANCE GROUP LIMITED are committed to responding promptly to all reported concerns.

Business and organisational structure: SCANDIC FINANCE GROUP LIMITED is a global conglomerate offering a variety of services, including: • Security: Scandic Sec • Real estate: Scandic Estate • Yacht charter: Scandic Yachts • Payment services: Scandic Pay • Trust services: Scandic Trust • Health solutions: Scandic Health • Credit card solutions: Scandic Finance • Trading services: Scandic Trade • Cryptocurrency services: SCN • Luxury vehicle rental: Scandic Cars • Company formation in the GCC: Scandic Setup • Aircraft charter / aviation security solutions: ScandicFly • Media: Publication of 115 proprietary daily newspapers on all continents

Our supply chain: SCANDIC FINANCE GROUP LIMITED's suppliers consist mainly of our own brands and global professional service providers. These service providers are typically large companies with their own supply chain policies and ethical standards. Due to the nature of our services, our main locations and the suppliers we use, we assess the risk of modern slavery in our supply chain as low and monitor this continuously.

Guidelines: We reinforce our guidelines on ethical business practices through regular comprehensive training for new and existing employees. Our business ethics policy stipulates that we only work with suppliers who meet high standards of social and ethical responsibility. When entering into new business relationships or expanding into new areas of business, we carry out appropriate due diligence to ensure that the same standards are maintained throughout the group. We always strive to obtain verifiable assurance from all suppliers that they comply with our standards. In addition, we take into account the health and safety of all those involved and the public in all our activities.

Our employees are encouraged to report concerns, warning signs, losses and near misses immediately and confidentially within a clearly defined risk management framework. We describe this in our annual report and financial statements.

Overall risk register: An overall risk register and any concerns raised by employees are regularly reviewed by the management team and board of SCANDIC FINANCE GROUP LIMITED. Issues in the supply chain, including those related to modern slavery and human trafficking, are addressed within this framework and resolved without delay.

Recruitment: As a global group, we recruit employees in many countries, including the United Kingdom (Great Britain and Northern Ireland), Australia, Latin America, North America, Europe, the United States of America, GCC/Middle East and Asia. When hiring, we conduct thorough checks, including verification of the right to work, to ensure that our employees work for us voluntarily and are not affected by modern slavery or human trafficking. Minimum wage obligation and victimisation: We pay all employees at least the statutory minimum wage for their location and review this regularly. Our diversity and inclusion policy prohibits any form of discrimination or victimisation. All employees are paid by bank transfer, and we do not allow payments to third parties. We require all recruitment agencies we work with to have policies against modern slavery and human trafficking or to commit to preventing such practices.

Process improvement: We will continuously improve our due diligence, KYC and AML processes and increase training and awareness measures for all employees.

Legal compliance: Operating globally, SCANDIC FINANCE GROUP LIMITED is subject to various national and international laws combating modern slavery and human trafficking. In the United Kingdom of Great Britain and Northern Ireland, we comply with the requirements of the Modern Slavery Act 2015 by publishing an annual statement setting out our measures to prevent slavery and human trafficking in our supply chain. In the Federal Republic of Germany, we comply with the Supply Chain Due Diligence Act ( - in the European Union ( - and the Corporate Sustainability Due Diligence Directive ( ), which require us to implement due diligence measures in our supply chain and report on our efforts. We strive to comply with all relevant laws and regulations in the countries in which we operate.

Approved by the company: This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015 ( ) and approved by the board of directors of SCANDIC FINANCE GROUP LIMITED. It will be updated annually in accordance with the reporting requirements of the Act.

Prepared, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED – Hong Kong, PRC, 1 December 2025

## **TERMS OF USE**

of

SCANDIC FINANCE GROUP LIMITED Room 10, Unit A, 7/F Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong / SAR-PRC Telephone HQ Switzerland, Zurich: +41 44 7979 99 – 85 Email: Commercial register:

in cooperation with: SCANDIC ASSETS FZCO Dubai Silicon Oasis DDP Building A1/A2 Dubai, 342001 / United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register:

in cooperation with: SCANDIC TRUST GROUP LLC IQ Business Centre, Bolsunovska Street 13–15 01014 Kyiv / Ukraine Telephone HQ United Kingdom, London: +44 7470 86 92 – 60 Email: Commercial register extract:

in cooperation with: LEGIER BETEILIGUNGS GMBH Kurfürstendamm 14 10719 Berlin / Federal Republic of Germany Commercial register Berlin: HRB 57837 Telephone: +49 (0) 30 9921134 – 69 Email: Commercial register:

Legal notice:

SCANDIC ASSETS FZCO, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP Limited Liability Company act as non-operational service providers (service companies without customer business). All operational and responsible activities in connection with the services described below are carried out exclusively by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China. 0. Scope, brand ecosystem and purpose of the terms of use (1) These terms of use govern the use of all online platforms, applications, interfaces (application programming interfaces), financial, asset management, custody, trading and other services in connection with digital assets and traditional assets (hereinafter collectively referred to as "SCANDIC Services" or "Platform"). (2) These Terms of Use apply to the SCANDIC brand ecosystem, in particular to the following brands and services: - LEGIER GROUP - SCANDIC SEC - SCANDIC FLY - SCANDIC PAY - SCN - SCANDIC CARS - SCANDIC DATA - SCANDIC SETUP - SCANDIC TRUST - SCANDIC CARDS - SCANDIC ESTATE - SCANDIC YACHTS - SCANDIC HEALTH - SCANDIC FINANCE, as well as for all structures held or supported by LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung in the media and investment sector, insofar as they support or promote financial, fiduciary, payment or investment services. (3) These Terms of Use incorporate European Union (EU) standards, international compliance requirements and applicable elements of the Supply Chain Due Diligence Act of the Federal Republic of Germany (LkSG), insofar as they are relevant. The mandatory law of the respective jurisdiction concerned shall always take precedence. (4) By registering a customer account, accessing the platform at and/or using SCANDIC services, you accept these Terms of Use in their current version as binding for you. (5) "You" and "your" refer to any natural or legal person who accesses the platform or uses SCANDIC services. "We", "us" and "our" refer to SCANDIC FINANCE GROUP LIMITED, including its legally permitted affiliates and contracted service providers. (6) Last updated: 1 December 2025. 1. Subject matter of the contract and legal nature of SCANDIC services (1) SCANDIC services include, but are not limited to:

- a) Provision of a technical infrastructure for initiating, displaying and, where applicable, processing transactions with digital assets (e.g. crypto tokens, stablecoins, other tokenised assets) and, where offered, with traditional assets;
- b) Custody and management of digital assets on behalf of users by SCANDIC FINANCE GROUP LIMITED or carefully selected third-party custodians;
- c) Functions for transferring, depositing and withdrawing digital assets;

- d) products offered where applicable, such as savings, income or staking programmes, structured products, credit and margin functions, derivatives and other specialised financial instruments in connection with digital assets;
  - e) Provision of information, analysis and communication services (e.g. chat and support functions).
- (2) SCANDIC services are provided exclusively within the scope of these Terms of Use and any supplementary product or special terms and conditions. There is no obligation to offer or maintain certain services on a permanent basis. We are entitled to adjust, expand or restrict the scope and type of services offered at any time, unless this is contrary to mandatory legal requirements.
- (3) SCANDIC FINANCE GROUP LIMITED is not a bank within the meaning of any jurisdiction in the world, nor is it a securities firm or investment advisor, unless otherwise specified in a particular jurisdiction with explicit reference to the relevant authorisation and supervision and communicated separately. Where regulated services are provided, this is done exclusively within the relevant regulatory framework of the respective competent supervisory authority.
2. Acceptance of the Terms of Use (1) By clicking on the corresponding confirmation field ("I agree"), by registering a customer account, by using the platform or by using a SCANDIC service, you declare that you:
- a) have read, understood and accepted these Terms of Use in full,
  - b) wish to be legally bound by these Terms of Use,
  - c) have taken note of all additional documents and guidelines referred to in these Terms of Use (e.g. privacy policy, risk disclosure, product terms and conditions).
- (2) If you do not understand or accept these Terms of Use, you may not register, open a customer account or use SCANDIC services.
- (3) Additional product- or country-specific terms and conditions may apply to individual SCANDIC services. In the event of any conflict, mandatory legal requirements shall prevail; otherwise, more specific product terms and conditions shall take precedence over these general Terms of Use.
3. Eligibility and KYC/AML requirements (1) Only persons or organisations who meet the following criteria are eligible to use SCANDIC services:
- a) are natural persons at least 18 years of age and have full legal capacity;
  - b) are duly established and represented as a legal entity, company, fund or other organisation under applicable law;
  - c) are fully authorised to enter into these Terms of Use on their own behalf or on behalf of the organisation they represent;
  - d) have not already been excluded or blocked from using SCANDIC services;

- e) are not subject to any sanctions, embargoes or other restrictions that would prohibit the use of SCANDIC services under applicable law;
  - f) are not located in or using a jurisdiction where access to SCANDIC services is prohibited or only possible with a licence that is not available.
- (2) SCANDIC FINANCE GROUP LIMITED operates in accordance with internationally recognised principles for the prevention of money laundering, terrorist financing and sanctions evasion (KYC – Know Your Customer / KYB – Know Your Business / Anti-Money Laundering, AML for short). To this end, we are entitled and, in some cases, obliged to request the following before and during the business relationship:
- a) request identity and authentication documents (e.g. copy of ID card, extract from the commercial register)
  - b) obtain information on beneficial owners, the origin of funds, business purpose and risk profile,
  - c) monitor and analyse transactions and report any suspected illegal activities,
  - d) temporarily block accounts or terminate business relationships if required by law or necessary to reduce risk.
- (3) You undertake to provide all information requested as part of the identity verification process truthfully, completely and up to date, and to notify us immediately of any changes. Incomplete or inaccurate information may result in the rejection, suspension or termination of the business relationship.
- (4) We reserve the right to adjust our eligibility criteria at any time. Where legally possible and reasonable, we will give advance notice of any significant changes in an appropriate manner.
4. Communication with SCANDIC FINANCE GROUP LIMITED (1) Further information about our offers can be found on our official websites and in the information documents provided there.
- (2) For enquiries, feedback or complaints, you can use the following contact details in particular:
- Email:
- (3) We will contact you using the contact details stored in your customer account (e.g. email, SMS, telephone, in-app message). You are obliged to keep these contact details up to date. A message sent to the last address you provided is deemed to have been received.
- (4) Electronic communication may be disrupted, delayed or misdirected for technical or network-related reasons. We accept no liability for damages resulting from typical risks of electronic communication (e.g. delayed or lost emails), unless there is gross negligence or intent on our part.

5. Customer account, access data and security (1) In order to use SCANDIC services, it is usually necessary to open a customer account. There is no entitlement to open or maintain an account.
  - (2) You undertake to treat your access data (in particular user names, passwords, two-factor authentication, recovery codes) as strictly confidential, to keep it safe and not to make it accessible to any third party.
  - (3) Any action taken on the platform using your valid access data will be attributed to you unless you can prove that unauthorised access occurred through no fault of your own and that you have taken all reasonable security measures.
  - (4) You are obliged to inform us immediately if you suspect that an unauthorised third party has gained access to your access data or your customer account. We are entitled to temporarily block access in order to prevent damage.
  - (5) SCANDIC FINANCE GROUP LIMITED takes appropriate organisational and technical measures to protect its systems and digital assets. Nevertheless, given the nature of digital technologies, absolute protection against cyber attacks, system failures and security incidents cannot be guaranteed.
6. Fees, charges and calculations (1) Fees and charges may apply for the use of certain SCANDIC services (e.g. trading fees, custody fees, network and transaction fees, interest or financing fees). The applicable fee structure is published on the platform or in specific product terms and conditions.
  - (2) By using the relevant service, you authorise us to deduct any fees and charges due directly from the assets available in your customer account. If the assets in a particular currency are insufficient, we are entitled to exchange other assets held by you at market conditions in order to settle the debt.
  - (3) All calculations made by us (e.g. settlement of fees, interest rates, income) are binding and final, unless there is an obvious error or mandatory legal provisions stipulate otherwise.
  - (4) We are entitled to adjust fees and charges. You will be notified of any changes in an appropriate manner before they take effect, insofar as this is legally required.
7. Chat, support and communication services (1) We may provide you with an interactive online chat service through which you can communicate with our support team and/or automated systems (e.g. chatbots). Where required by law, we will disclose when automated communication partners are involved.
  - (2) Content from the chat service may be stored, evaluated and used for quality, training and documentation purposes, insofar as this is permitted under data protection law and complies with our data protection regulations.
  - (3) Where applicable, user chats may be offered in which you can communicate with other users. In such cases, you are solely responsible for the content of your messages.
  - (4) In particular, it is prohibited to:

- to disseminate offensive, discriminatory, defamatory or obscene content,
  - promoting or glorifying violence, hatred, extremism or criminal acts,
  - disseminating market-manipulative, misleading or false information about investment or market movements,
  - deceiving, threatening or harassing other users.
- (5) Violations may result in the immediate termination of a chat session, warnings, the blocking or termination of the customer account, and reporting to the relevant authorities.
8. General risk warning regarding digital assets and financial products

Important note: Trading, holding and investing in digital assets involves significant risks. You may lose some or all of your invested capital. You should only use funds that you can afford to lose, both financially and psychologically.

- (1) No investment, legal or tax advice
  - a) SCANDIC FINANCE GROUP LIMITED does not provide individual investment advice, legal advice or tax advice within the scope of these Terms of Use.
  - b) The information we provide (e.g. market information, analyses, research notes, white papers, blogs) is of a general nature only and is not a substitute for individual advice from qualified third parties (e.g. tax advisors, solicitors, investment advisors).
  - c) You are solely responsible for your decisions regarding the purchase, holding, sale or other transactions involving digital or traditional assets.
- (2) Market and price risk
  - a) Digital assets are subject to extreme price fluctuations in some cases. The market can rise or fall sharply within a very short period of time.
  - b) Past performance is not a reliable indicator of future developments.
  - c) A total loss of the capital invested is possible.
- (3) Liquidity risk
  - a) There may be a lack of a liquid market for certain digital assets. It may therefore be difficult or impossible to close a position at a price that suits you at short notice.
  - b) Liquidity may be significantly restricted during periods of market stress.
- (4) Counterparty and third-party risk
  - a) When using SCANDIC services, third parties may be involved, such as payment service providers, banks, custodians, exchanges or liquidity providers.
  - b) Performance disruptions or failures on the part of such third parties (e.g. insolvency, technical disruptions, freezing of accounts) may lead to delays, losses or limited availability of your assets.

- c) We select service providers carefully, but cannot completely rule out the risk of third-party failures.
- (5) Technological and security risks
  - a) Blockchain networks, smart contracts and digital infrastructures may contain errors, security vulnerabilities, hacks, protocol errors or unexpected behaviour.
  - b) Cyber attacks, phishing, malware, ransomware or other attacks may result in the loss of private keys, access data or assets.
  - c) We take appropriate security measures, but no platform can guarantee absolute security.

You are obliged to take your own security measures (two-factor authentication, secure passwords, secure end devices, etc.).

- (6) Legal and regulatory risks
  - a) The legal status of many digital assets has not yet been conclusively clarified in numerous jurisdictions or is subject to ongoing changes.
  - b) Changes in legislation, regulatory measures or bans may affect or restrict the usability, value and transferability of digital assets and the provision of certain SCANDIC services.
  - c) In some countries, digital assets may not be recognised as property in the civil law sense, which may have an impact on legal protection and the enforceability of claims.
- (7) Tax risks
  - a) Income, profits or transactions involving digital assets may have tax implications (e.g. income tax, corporation tax, VAT).
  - b) You are solely responsible for the correct tax declaration and payment of any taxes.
  - c) We do not provide tax advice and accept no responsibility for the tax consequences of your transactions.
- (8) Risks associated with leveraged, margin and derivative products
  - a) Leveraged products (e.g. margin trading, futures, options or other derivatives) carry a particularly high risk of loss. Even small market movements can trigger disproportionately large losses.
  - b) You may be required to make additional payments; you may lose more than your initial capital investment.
  - c) If you use margin or derivative products, you are obliged to monitor open positions and margin requirements on an ongoing basis.
- (9) Risks of staking, income and interest products



- a) Products in which digital assets are "staked", lent or used to generate income (e.g. income accounts, lending programmes, on-chain staking, off-chain staking, "earn" products) are subject to additional risks, including:
  - Protocol risks (e.g. slashing, protocol errors, forks)
  - Counterparty risks (default of borrowers or protocols),
  - Liquidity risks (delays in redemptions, lock-up periods),
  - Market volatility during lock-up or holding periods.
- b) Yield and interest rate information is generally indicative, variable and not guaranteed. There is no entitlement to specific returns unless this is expressly and legally guaranteed.

(10) Risks of stablecoins and de-pegging

- a) Stablecoins are designed to be pegged to a reference value (e.g. a government currency). Nevertheless, there is a risk that this pegging cannot be maintained for market, issuer or regulatory reasons.
- b) Decoupling can lead to significant price movements, liquidity bottlenecks, increased margin requirements and losses.
- c) The stability of stablecoins depends on the creditworthiness, risk management and regulation of the issuers. A default or serious disruption at the issuer can massively affect the value of the stablecoin.

(11) On-chain yields and decentralised finance (DeFi) applications

- a) If your assets are invested in decentralised finance (DeFi) protocols, smart contracts or other on-chain applications via our services, there are additional protocol, smart contract, governance and liquidity risks.
- b) Such protocols are often subject to no or only limited government oversight. Losses due to hacks, exploits or malfunctions may be permanent.

(12) Round-the-clock markets and monitoring risk

Markets for digital assets are generally open 24 hours a day, seven days a week. Significant market movements can occur even when you are not actively monitoring your positions. This can lead to unexpected profits, but also to significant losses.

- 9. User obligations and conduct (1) You agree to use SCANDIC services only in accordance with applicable laws and these Terms of Use. In particular, it is prohibited to:
  - a) using the platform for money laundering, terrorist financing, sanctions evasion, fraud or other illegal purposes;
  - b) providing false information about yourself, your organisation, beneficial owners or the origin of funds;
  - c) circumventing technical protection measures, access controls or security mechanisms;

- d) to perform automated queries or high-frequency access without our prior written consent;
  - e) infringe the rights of third parties (e.g. copyright, trademark or personal rights).
- (2) You are obliged to keep your access data secret, protect your end devices and install security updates promptly.
- (3) You must inform us immediately of any unauthorised use of your account, security breaches, suspected fraud or misuse.
10. Intellectual property (1) All content on the platform (e.g. software, source code, designs, logos, trademarks, texts, graphics, databases) is protected by copyright, trademark or other intellectual property rights and, unless otherwise stated, is the property of SCANDIC FINANCE GROUP LIMITED or third-party licensors.
- (2) You are granted a non-exclusive, non-transferable, revocable right to use the platform and the content provided exclusively within the scope of these Terms of Use and only for the intended purpose.
- (3) Any reproduction, editing, distribution, public disclosure or other use beyond the intended use is not permitted without our prior written consent.
11. Data protection (1) The protection of your personal data is important to us. Personal data is processed exclusively in accordance with the applicable data protection legislation (e.g. the General Data Protection Regulation of the European Union, the data protection law of the Hong Kong Special Administrative Region, where applicable).
- (2) Details on the processing of personal data, your rights as a data subject and how to contact the data protection officer of the Special Administrative Region of the People's Republic of China can be found in our separate privacy policy, which forms part of these Terms of Use.
12. Liability and limitation of liability (1) We are liable without limitation for damages resulting from injury to life, limb or health caused by intentional or grossly negligent breach of duty by us or our legal representatives or vicarious agents.
- (2) We are only liable for other damages in cases of intent and gross negligence. In the event of a simple negligent breach of essential contractual obligations (cardinal obligations), liability is limited to the typically foreseeable damage. Cardinal obligations are those obligations whose fulfilment is essential for the proper execution of the contract and on whose compliance the contractual partner may regularly rely.
- (3) We are not liable for:
- a) Losses resulting from market price movements, volatility or impairment of digital or traditional assets;
  - b) Damages based on typical risks of digital technologies (e.g. failure of the blockchain infrastructure, network disruptions, internet outages), provided that we have not caused these through negligence;

- c) losses based on actions or omissions of third parties (banks, payment service providers, issuers of digital assets, stock exchanges, custodians), provided that we have selected them with due care and there is no other legal obligation to assume liability.
- (4) Limitations of liability do not apply if mandatory legal provisions (e.g. consumer protection law, capital market law, supervisory law) stipulate otherwise.
- 13. Blocking and termination of accounts (1) We may terminate the business relationship with you at any time with reasonable notice, unless otherwise required by mandatory regulations (e.g. consumer law). Your right to terminate remains unaffected.
- (2) Extraordinary termination without notice, blocking or restriction of your account is permissible in particular if:
  - a) there is suspicion that you are violating laws, these Terms of Use or other guidelines;
  - b) there are requests from law enforcement agencies, courts or supervisory authorities;
  - c) you have provided inaccurate or incomplete information about your identity or beneficial owners;
  - d) there is a risk to the stability, integrity or security of the platform.
- (3) In the event of a suspension, we will – to the extent permitted by law – attempt to inform you of the reasons and give you the opportunity to comment.
- (4) Depending on regulatory requirements, investigative measures or technical restrictions, it may be necessary to temporarily freeze assets or restrict withdrawals.
- 14. Changes to the Terms of Use (1) We reserve the right to amend these Terms of Use at any time in order to:
  - a) implement new legal or regulatory requirements,
  - b) introduce new products or functionalities,
  - c) take into account security or clarification requirements.
- (2) Changes will be communicated to the user in an appropriate form (e.g. by email, in-app notification or at the next login). Where legally required, changes will only take effect after a reasonable period of time.
- (3) If you do not object to the amended terms within the notified period and continue to use the SCANDIC services, the changes shall be deemed accepted. In the event of an objection, the business relationship may be terminated or your use may be limited to the previous legal situation, insofar as this is legally and technically possible.

15. Applicable law and place of jurisdiction (1) Unless mandatory consumer protection regulations dictate otherwise, these Terms of Use relating to the core SCANDIC services of SCANDIC FINANCE GROUP LIMITED are governed by the laws of the Hong Kong Special Administrative Region of the People's Republic of China.  
(2) For specific services provided by affiliated companies in other jurisdictions (e.g. United Arab Emirates, Federal Republic of Germany, Ukraine, United Kingdom), the law of the respective jurisdiction may apply in addition or primarily. This is indicated in the relevant product or special terms and conditions.  
(3) If the user is a merchant, a legal entity under public law or a special fund under public law, the exclusive place of jurisdiction for all disputes arising from or in connection with these Terms of Use shall be Hong Kong, to the extent permitted by law. Mandatory statutory consumer jurisdictions remain unaffected.
16. Language, interpretation and severability clause (1) The authoritative language of the contract is English. Translations into other languages are for comprehension purposes only. In the event of discrepancies, the German version shall prevail.  
(2) Should any provision of these Terms of Use be or become invalid or unenforceable in whole or in part, this shall not affect the validity of the remaining provisions. In place of the invalid or unenforceable provision, a valid provision shall be deemed to have been agreed which comes closest to the economic purpose of the invalid or unenforceable provision.  
(3) In case of doubt, the interpretation of these Terms of Use shall be based on a fair interpretation that is consistent with mandatory legal requirements and the protection of the integrity, transparency and stability of the financial markets.

Note: By creating or maintaining a customer account and using SCANDIC services, you reconfirm that you have read, understood and accepted these Terms of Use in full, including the general risk warning, and that you bear all associated risks on your own responsibility. Drafted, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED Hong Kong, SAR-PRC, 1 December 2025 Legal representation: Clifford Chance, Global Law Firm

## Supply Chain

Supply Chain Policy (SCANDIC FINANCE GROUP LIMITED Supply Chain Policy for the SCANDIC Brand Ecosystem)

1. Preamble This Supply Chain Policy ("Policy") sets out the binding principles, processes and responsibilities for the integrated, globally oriented management of the supply chain of SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong, Room 10, Unit A, 7/F, Harbour Sky, 28 Sze Shan Street, Yau Tong, Hong Kong / SAR-PRC.

It applies in cooperation with:

SCANDIC ASSETS FZCO, Dubai Silicon Oasis DDP Building A1/A2, Dubai, 342001, United Arab Emirates

SCANDIC TRUST GROUP LLC, IQ Business Centre, Bolsunovska Street 13–15, Kyiv  
— 01014, Ukraine

LEGIER BETEILIGUNGS GESELLSCHAFT MIT BESCHRÄNKTER HAFTUNG,  
Kurfürstendamm 14, 10719 Berlin, Federal Republic of Germany

Legal notice:

SCANDIC ASSETS FZCO, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP LLC act as non-operational service providers. All operational and responsible activities are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

This policy applies to the SCANDIC brand ecosystem, in particular to the following brands and services:

SCANDIC SEC

SCANDIC FLY

SCANDIC PAY

SCN

SCANDIC CARS

SCANDIC DATA

SCANDIC SETUP

SCANDIC TRUST

SCANDIC CARDS

SCANDIC ESTATE

SCANDIC YACHTS

SCANDIC HEALTH

SCANDIC FINANCE

as well as for all structures held or supported by SCANDIC FINANCE GROUP LIMITED, insofar as they enable or support financial, fiduciary, payment, investment, security, health, real estate or other services and product offerings within the group.

The policy is designed to be applicable in global legal transactions and to ensure compliance with international, supranational (in particular European Union) and national legal standards.

**2. Purpose, objective and scope 2.1 Purpose The purpose of this policy is to establish a uniform, transparent and legally compliant supply chain management system that:**

controls all relevant supply chain processes (planning, procurement, production, service provision, distribution, return and disposal)

systematically implements human rights, labour law, environmental and principle-based requirements,

ensures compliance with global legal frameworks (including those of the European Union, national legal systems and international standards) and

ensures end-to-end traceability and controllability through a digital image as a "digital twin" and a central control and monitoring point for the supply chain.

**2.2 Scope** This policy applies:

to all organisational units and brands of SCANDIC FINANCE GROUP LIMITED worldwide,

to all group companies and associated companies, insofar as they act on behalf of SCANDIC FINANCE GROUP LIMITED or provide services for the SCANDIC brand ecosystem,

to all suppliers, subcontractors, service providers, distribution partners, cooperation partners and other third parties who are directly or indirectly involved in the provision of services or products.

The basic requirements of this policy must be contractually incorporated into the cooperation with suppliers and partners.

### **3. Definitions** The following terms apply in particular to this policy:

**Supply chain:** All activities and actors from input (resources, data, capital, infrastructure, personnel, services) through conversion (production, project and service provision) to final delivery, use, disposal and aftercare.

**Supply chain management:** Strategic and operational coordination of all supply chain activities to increase effectiveness in terms of customer benefit and efficiency, and to ensure legal compliance, sustainability and resilience.

**Digital twin:** Semantically linked digital representation of all relevant assets, processes, nodes, flows, service levels, risks, controls and events in the supply chain.

**Central control and monitoring point for the supply chain:** Central, digital platform for monitoring and controlling the supply chain in real time with analytics, early risk detection, simulation of different scenarios and recommendations for action.

**Suppliers and business partners:** All external persons, organisations and companies that provide goods, services or other services within the supply chain.

**Risk-based approach:** Prioritisation of measures according to probability of occurrence, severity of possible impacts – in particular on human rights, the environment and legal compliance – and the possibility of control.

### **4. Basic principles of supply chain management** SCANDIC FINANCE GROUP LIMITED is committed to adhering to the following basic principles:

Global legal compliance Compliance with all applicable local, national, regional and international regulations, in particular those of the European Union, including the relevant directives and regulations and the national implementing laws based on them.

Respect for human rights and labour standards Alignment with the United Nations Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organisation and the relevant international conventions against child labour, forced labour, discrimination and exploitation.

Environmental and climate protection Integration of environmental and climate-related due diligence obligations, including regulations on deforestation-free supply chains, conflict minerals, the prohibition of products made using forced labour, and the energy efficiency of buildings and products.

Integrity, transparency and responsible corporate governance Zero tolerance for corruption, money laundering, terrorist financing, tax evasion, market abuse and other economic crimes.

Data protection, data security and digital resilience Compliance with the General Data Protection Regulation, the Directive on privacy and electronic communications, the Digital Services Regulation, the Digital Markets Regulation, the Directive on measures for a high common level of cybersecurity across the Union, the Regulation on digital operational resilience of the financial sector, the Cyber Resilience Act, the European Health Data Space and the Regulation on artificial intelligence, where relevant.

Risk-based management and continuous improvement Systematic identification, assessment and treatment of risks along the entire supply chain, including regular audits, monitoring, evaluations and improvement programmes.

**5. Integrated process map based on the reference model for supply chain operations The Group-wide process map is based on an adapted reference model for supply chain operations and comprises the following main processes:**

**Planning**

Strategy, planning and coordination of capacity, demand, liquidity and campaigns across all brands (SCANDIC PAY, SCANDIC ESTATE, SCANDIC TRADE, SCANDIC FLY, SCANDIC YACHTS, SCANDIC DATA, SCANDIC TRUST, SCANDIC SEC, SCANDIC HEALTH and others).

Planning scenarios for legal changes, crises and peaks in demand.

**Procurement**

Selection, qualification and onboarding of suppliers and partners, including identification checks based on the "know your customer" principle, money laundering prevention and determination of beneficial owners.

Drafting contracts, agreeing service levels, sustainability and human rights clauses.

**Manufacturing, conversion, provision of services**

Provision of services, project management, content creation, development and operation of systems, medical services, security services, financial and trading services.

Ensuring quality and compliance with legal requirements, approval processes.

Delivery and operation

Logistics, hosting, operation of platforms, aviation and shipping services, digital distribution, customer service, billing and payment processing.

Ensuring availability, performance and compliance with transparency and information requirements, in particular towards consumers and supervisory authorities.

Withdrawal and response

Handling complaints, grievances, removal and blocking requests, dealing with incidents in the areas of security, data protection, medicine and operations.

Evaluating experiences, creating quality cycles and implementing corrective and preventive measures.

Enabling functions

Operation of data centres, identity and access management, security control centres, management of master data and ontologies, financial control, legal and compliance departments, internal auditing.

6. **Brand-related end-to-end value streams The guideline takes into account the specific characteristics of each brand and integrates them into end-to-end value streams.**

6.1 SCANDIC PAY, SCN and SCANDIC FINANCE (payments, financing, digital assets)

Incoming and procurement: project initiators, investors, payment service providers, card programmes, digital asset issuers, banks.

Conversion and services: Project and customer checks, listing of projects and digital assets, orchestration of payment processes, technical and legal mapping of digital assets, implementation of the Regulation on Markets in Crypto-Assets, the Regulation on Information Accompanying Transfers of Funds and Certain Transfers of Crypto-Assets, the Second Payment Services Directive and the Directives on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing.

Delivery and operation: operation of platforms, monitoring of money laundering risks, reporting to supervisory authorities, payouts to investors, compliance with data protection and information obligations.

6.2 SCANDIC ESTATE (property development and real estate brokerage)

Incoming and procurement: land, real estate properties, developers, construction and service companies, authorities, capital partners.



Transformation and services: Project development, valuation, marketing, contract drafting, review of environmental, social and governance aspects, compliance with building and energy efficiency regulations.

Delivery and operation: handover and aftercare, property management, management of land and properties, communication and logistics structures.

#### 6.3 SCANDIC TRADE (trading in financial instruments, foreign exchange, crypto assets, commodities and emission rights)

Receipt and procurement: market data providers, stock exchanges, liquidity partners, clearing houses, supervisory authorities.

Transformation and services: order management, risk management including risk measurement, portfolio and financial control functions, trading in traditional financial instruments and digital assets, implementation of the Markets in Financial Instruments Directive, the Markets in Financial Instruments Regulation, the Market Abuse Regulation, the Prospectus Regulation and the regulations on sustainability-related disclosures in the financial services sector.

Delivery and operation: settlement, reporting, transparency reports, customer interfaces, end-to-end monitoring.

#### 6.4 SCANDIC FLY (private jet charter and special flights)

Input and procurement: aircraft operators, aircraft fleets, crews, airports, ground handling companies, security and compliance partners.

Conversion and services: Flight planning, route optimisation, slot management, safety and evacuation concepts, compliance with European Aviation Safety Agency and aviation authority requirements.

Delivery and operation: execution of charter flights, customer service, handling of delays, handling of compensation claims and complaints.

#### 6.5 SCANDIC YACHTS (yacht brokerage and charter)

Acquisition and procurement: shipyards, yacht owners, classification societies, insurers.

Conversion and services: valuation, mandating, marketing, examination of ownership and legal relationships, handover processes.

Delivery and operation: yacht management, crew planning, coordination with ports, logistics, charter processing in compliance with regulations for recreational craft, port and ship safety, and passenger rights.

#### 6.6 SCANDIC DATA (data centre and digital platforms)

Receipt and procurement: content from editorial offices, brand and customer data, telemetry data, partner data streams.

Transformation and services: processing, integration, storage and analysis of data, development of digital services, high-performance computing, use of artificial intelligence methods.

Delivery and operation: Operation of data centres, connection of edge locations and distribution networks for content, monitoring of systems, data backup and disaster recovery in accordance with data protection, data, cyber and platform regulations.

#### 6.7 SCANDIC TRUST and SCANDIC GROUP (trust, asset protection, succession planning)

Intake and procurement: clients, family assets, legal and tax framework conditions.

Conversion and services: structuring of assets, establishment of trust mandates, succession planning, consideration of environmental, social and governance objectives, compliance with regulations on beneficial owners and cross-border tax arrangements.

Delivery and operation: management of trust assets, reporting, cooperation with payment, trade, real estate, yacht and aviation sectors.

#### 6.8 SCANDIC SEC (physical and digital security services)

Intake and procurement: threat analyses, properties, locations, persons and assets requiring protection.

Transformation and service: Creation of security concepts, planning and implementation of protective measures, detection and response to cyber attacks, compliance with requirements for critical facility resilience and network and information security.

Delivery and operation: Operation of security control centres around the clock, planning and implementation of security measures for travel and events, crisis, emergency and evacuation planning.

#### 6.9 SCANDIC HEALTH (medical services, in particular ear, nose and throat medicine)

Intake and procurement: Clinics, practices, medical devices and products, patient flows.

Transformation and services: Diagnostics, therapy, surgical procedures, quality and hygiene processes in accordance with the requirements for medical devices, in vitro diagnostics and health data.

Delivery and operation: Medical care, telemedicine, billing, protection of patient rights and compliance with data protection and data security requirements.

### 7. **Governance, organisation and responsibilities**

#### 7.1 Governance structure

The Board of Directors of SCANDIC FINANCE GROUP LIMITED has overall responsibility for compliance with and further development of this policy.

A group-wide central control and monitoring point for the supply chain will be established, with round-the-clock monitoring, risk management, incident coordination,

data and ontology management, security operations, legal and compliance functions, and financial control.

Each brand will appoint a person responsible for the supply chain ("Supply Chain Manager") who will ensure the implementation of this policy in their respective area.

## 7.2 Roles and responsibilities

The persons responsible for the supply chain in the brands and the respective operational process managers are accountable.

The management of SCANDIC FINANCE GROUP LIMITED is accountable.

The legal department, compliance, data protection, information security, internal audit and other specialist departments are consulted.

All relevant functions and parties involved, including suppliers, partners and, where applicable, customers, must be informed.

**7.3 Order of regulations** This supply chain policy is specified in more detail by specific subordinate policies and manuals, for example by a human rights policy, an environmental and climate policy, a data protection policy, an information security policy and a third-party management policy.

In the event of contradictions, the following applies:

Mandatory legal requirements take precedence,  
followed by this Supply Chain Policy as a framework,  
followed by the specific technical guidelines.

## 8. **Requirements for suppliers and business partners**

**8.1 Minimum requirements** All suppliers and business partners must:

comply with all laws applicable in their jurisdictions, in particular those relating to human and labour rights, environmental, safety and data protection requirements,

strictly exclude forced labour, child labour, human trafficking, discrimination, harassment and other human rights violations,

implement effective measures to prevent corruption, fraud, money laundering and terrorist financing, and maintain transparent structures for beneficial owners,

observe environmental due diligence obligations, in particular with regard to deforestation-free supply chains, conflict minerals and the prohibition of products associated with forced labour,

ensure responsible data processing and an appropriate level of cyber security.

**8.2 Checks prior to establishing a business relationship and during its continuation** A risk-based check is carried out prior to establishing a business relationship. This includes in particular:

Establishing and verifying the identity of the contracting parties and their beneficial owners

Checking against sanctions lists and for the presence of politically exposed persons  
assessing human rights, environmental and compliance risks,

Checking the technical and organisational measures in place to protect personal, financial and confidential data.

8.3 Contract drafting Contracts with suppliers and partners contain in particular:

a binding reference to this policy and corresponding behavioural requirements for the supply chain,

Clauses expressly prohibiting forced labour, child labour, corruption, money laundering, tax evasion, cyber attacks and data protection violations,

rights to carry out audits and inspections,

regulated reporting mechanisms for violations and incidents,

Appropriate remedial measures and the right to terminate the contract without notice in the event of serious or repeated violations.

## 9. **Risk analysis, due diligence and resilience**

9.1 Risk management system SCANDIC FINANCE GROUP LIMITED operates a group-wide risk management system that:

identifies risks in the supply chain across all brands and regions,

assesses risks qualitatively and quantitatively,

defines appropriate preventive, mitigation and remedial measures,

regularly reviews and updates risks, controls and measures.

9.2 Integration of legal requirements regarding due diligence and sustainability These include in particular:

the Directive on corporate sustainability due diligence obligations,

the Regulation on deforestation-free supply chains,

the Regulation on conflict minerals,

the Regulation on the prohibition of products associated with forced labour,

the Directive on corporate sustainability reporting,

Directives on the prevention of money laundering and terrorist financing,

Regulations on registers of beneficial owners,

the General Data Protection Regulation,

the Directive on measures for a high common level of cybersecurity across the Union,  
the Regulation on digital operational resilience of the financial sector,  
the legislative act on cyber resilience,  
the Regulation on data governance,  
the Regulation on harmonised rules for access to and use of data,  
the Regulation on Digital Services and the Regulation on Digital Markets,  
sector-specific regulations in aviation, shipping, medicine, financial markets and  
payment transactions.

9.3 Measures to strengthen resilience Examples of measures to strengthen resilience  
include:

multiple data centre locations with redundant infrastructure, automatic failover in the  
event of failure, protection against attacks to overload services,

structured monitoring of legal changes, ongoing training, technical capabilities for short-  
term adaptation of functions, complete logging of relevant activities,

Establishment of alternative suppliers and operators, safeguard mechanisms in  
contracts, emergency capacities,

automatic scaling of technical resources during peak demand and prioritisation of critical  
services,

travel and event safety concepts, evacuation and crisis plans, protected communication  
channels and crisis teams.

## 10. **Digital twin, central control point for the supply chain and data architecture**

10.1 Digital twin The digital twin of the supply chain includes in particular:

projects, transactions, assets, contracts, flights, ships and yachts, real estate properties,  
campaigns, customers, payments, orders, incidents and mandates,

relationships between these entities,

service levels, risks, controls and the origin of data.

10.2 Integration and data architecture The data and integration architecture includes:

an integration layer for event-driven processing and periodic batch processing,

a semantic layer with a uniform data model and ontology that defines entities,  
characteristics, relationships, and data protection and security labels,

application interfaces for centralised monitoring and control of the supply chain with  
overviews, root cause analyses, instructions for action, simulations and approval  
processes,

a comprehensive security and data protection concept with encryption, access restrictions, secret management and logging of all relevant accesses.

## **11. Key figures, monitoring and reporting**

11.1 Key performance indicators Key performance indicators are used for control and monitoring, for example:

in payment and trading processes: approval rates, time to final settlement, chargeback rate, utilisation of risk and security margins,

in the real estate sector: time to contract completion, duration of approval procedures, environmental, social and governance assessments, vacancy rates,

in aviation and yacht operations: punctuality rates, frequency of safety-related incidents, utilisation, energy and carbon dioxide consumption,

in the data and media sector: availability, delay times, timeliness of data, average time to resolution of incidents,

in the areas of trust, security and health: compliance with service levels, audit results, frequency and severity of incidents, response times and satisfaction ratings.

### **11.2 Monitoring**

Continuous monitoring of relevant key figures and risks by the central control point for the supply chain,

defined thresholds with automatic alerts and escalation paths,

Regular reports to senior management and the responsible persons at the brands.

### **11.3 Public and regulatory reporting**

Fulfilment of all sustainability and supply chain reporting obligations, including those arising from the Corporate Sustainability Reporting Directive and national supply chain laws,

Compliance with reporting obligations relating to digital services and markets, as well as other sector-specific reporting requirements.

## **12. Training, awareness raising and communication**

Regular training for employees, management and key personnel on the content and implementation of this policy.

special training for areas with increased risks, in particular for procurement, legal, compliance, information security, safety, health and information technology,

Provision of appropriate information and communication channels so that this policy is accessible and can be applied at all times.

## **13. Complaint channels, whistleblower systems and remedial measures**

Establishment of a group-wide system for submitting reports that enables anonymous and confidential reports of actual or suspected violations of this policy

Requiring suppliers to operate their own reporting systems or to join the group-wide whistleblowing system.

Procedures for the independent investigation, evaluation and documentation of incoming reports and complaints.

Definition and implementation of appropriate remedial measures, which may range from training and education measures to process adjustments and personnel or contractual consequences.

#### **14. National legal frameworks**

The European directives and regulations referred to in this policy are implemented in the Member States of the European Union through national laws and on the basis of the requirements of national supervisory and control authorities.

SCANDIC FINANCE GROUP LIMITED undertakes to take into account the respective national implementation acts and regulatory requirements in all relevant activities and to supplement local guidelines and process descriptions as necessary.

#### **15. Implementation and transitional provisions**

##### **15.1 Phases of implementation**

Foundation phase (first three months)

Inventory of supply chains and supplier relationships,

Establishment of an initial digital twin with recording of brands, assets, processes and service levels,

Establishment of a central monitoring and control function with overviews, alerts and basic instructions for action

Harmonisation of identification and money laundering verification processes and contract registers.

Scaling phase (three to six months)

Expansion to comprehensive legal and compliance workflows,

Introduction of group-wide identity and access management,

Introduction of forecasting models for demand, capacity and sales,

Development of a simulator for different scenarios in the supply chain.

Advanced phase (six to twelve months)

Partially automated control of responses such as capacity shifts, redirection of payment flows and optimisation of routes and time windows in aviation and logistics

Integration of revenue and operational planning across multiple brands,

Establishment of continuous reporting on sustainability and due diligence, including external audits.

Conducting structured tests to verify resilience, particularly in the area of information security.

#### 15.2 Review and amendment of the policy

This policy will be reviewed at least once a year and on special occasions such as significant legal changes, new business models or serious incidents.

Amendments shall be decided by the Board of Directors of SCANDIC FINANCE GROUP LIMITED and announced throughout the Group.

### 16. Final provisions

This supply chain policy shall enter into force upon its adoption by the management of SCANDIC FINANCE GROUP LIMITED.

It replaces previous regulations on supply chain management insofar as they conflict with the principles set out herein.

In countries with mandatory, stricter legal regulations, these regulations take precedence over the provisions of this policy. In all other cases, the provisions of this policy are considered a minimum standard that must not be fallen short of.

Failure to comply with this policy may result in labour law, civil law and criminal law consequences and will not be tolerated by SCANDIC FINANCE GROUP LIMITED.

Drafted, signed and approved:

The Board of Directors of SCANDIC FINANCE GROUP LIMITED

Hong Kong, SAR-PRC, 1 December 2025 Legal representation: Clifford Chance, Global Law Firm

### Sustainability

#### SUSTAINABILITY POLICY of SCANDIC FINANCE GROUP

3. Preamble, applicability and legal notice This Sustainability Policy sets out the principles, objectives, responsibilities, processes and control mechanisms of SCANDIC FINANCE GROUP LIMITED, with registered office at: SCANDIC FINANCE GROUP LIMITED by Scandic Banking Hong Kong Room 10, Unit A, 7th Floor Harbour Sky, 28 Sze Shan Street Yau Tong, Hong Kong, SAR-PRC Telephone headquarters Switzerland, Zurich: +41 44 7979 99 – 85 Email: Commercial register: in cooperation with: SCANDIC ASSETS FZCO Dubai Silicon Oasis, DDP Building A1/A2 Dubai, 342001, United Arab Emirates Telephone: +971 56 929 86 – 90 Email: Commercial register: in cooperation with: SCANDIC TRUST GROUP LLC IQ Business Centre, Bolsunovska Street 13–15 01014 Kyiv, Ukraine Telephone Headquarters United Kingdom of Great Britain and Northern Ireland, London: +44 7470 86 92 – 60 Email: Commercial register extract:



in cooperation with: LEGIER BETEILIGUNGS GMBH Kurfürstendamm 14 10719 Berlin, Federal Republic of Germany Telephone: +49 (0) 30 9921134 – 69 Email: Commercial register:

Legal notice: SCANDIC ASSETS FZCO, LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung and SCANDIC TRUST GROUP LLC act as non-operational service providers, investment and service companies. All operational and responsible activities within the meaning of this Sustainability Policy are carried out by SCANDIC FINANCE GROUP LIMITED, Hong Kong, Special Administrative Region of the People's Republic of China.

This policy applies to the SCANDIC brand ecosystem, in particular to the following brands and services: SCANDIC SEC SCANDIC FLY SCANDIC PAY SCN SCANDIC CARS SCANDIC DATA SCANDIC SETUP SCANDIC TRUST SCANDIC CARDS SCANDIC ESTATE SCANDIC YACHTS SCANDIC HEALTH SCANDIC FINANCE

as well as all structures, platforms, data centres, media, financial, payment, trust, technology and investment services held, controlled, operated or supported by SCANDIC FINANCE GROUP LIMITED (hereinafter collectively referred to as "SCANDIC FINANCE GROUP LIMITED and SCANDIC brand ecosystem").

The policy is designed for global legal transactions. It is based on recognised international standards for environmental, social and corporate governance (ESG standards) and relevant frameworks such as:

Global Reporting Initiative (global reporting standard on sustainability), Task Force on Climate-related Financial Disclosures, International Financial Reporting Standard S2 on climate-related disclosures, European Union Corporate Sustainability Reporting Directive, European Sustainability Reporting Standards, German and international rules on due diligence in supply chains (e.g. German Supply Chain Due Diligence Act) and other relevant national and international regulations, insofar as they apply to business activities.

## 1. **Self-image, business model and sustainability mission statement**

1.1 Business model and structure SCANDIC FINANCE GROUP LIMITED sees itself as a globally active finance, technology, data, media and service ecosystem that is particularly active in the following areas: financial and payment services (SCANDIC FINANCE, SCANDIC PAY, SCN, SCANDIC CARDS, SCANDIC TRUST), transport and mobility in the premium segment (SCANDIC FLY, SCANDIC CARS, SCANDIC YACHTS), real estate and asset solutions (SCANDIC ESTATE), data, data centre and technology infrastructure (SCANDIC DATA), health and digital health services (SCANDIC HEALTH), company formation, structuring and fiduciary solutions (SCANDIC SETUP, SCANDIC TRUST), media and investment activities in association with LEGIER Beteiligungs Gesellschaft mit beschränkter Haftung.

Value creation is based on a digital-first strategy, international locations and a networked brand ecosystem that requires uniform compliance, risk and sustainability standards.

1.2 Sustainability mission statement SCANDIC FINANCE GROUP LIMITED and the SCANDIC brand ecosystem pursue a mission statement based on the following principles:

Responsibility for the environment and climate: We are committed to a path towards climate neutrality and to the responsible use of all natural resources across the entire value chain. Respect for human rights and fair working conditions: We recognise internationally recognised human rights and embed them in our own business processes and supply chain. Integrity, transparency and good corporate governance: We conduct our business in a lawful, transparent and ethical manner, free from corruption or conflicts of interest. Data protection, information security and protection of civil liberties: We consider the protection of personal data, privacy and fundamental digital rights to be a central part of our responsibility.

- Technology and artificial intelligence ethics: We only use technology and artificial intelligence in accordance with clear ethical principles, transparent governance and human oversight. - Social contribution and media and information ethics: Through our services, platforms and, where relevant, media offerings, we contribute to an informed, pluralistic, democratic and sustainable society.

## 2. **Sustainability goals and objectives**

2.1 Climate and environmental goals SCANDIC FINANCE GROUP LIMITED has defined the following long-term goals for its own locations (including data centres, offices and other infrastructure) and within the Group's sphere of influence:

- Climate neutrality for direct and indirect emissions from energy use (Scope 1 and Scope 2): Targeted net zero emissions in the area of direct emissions (e.g. heating energy, own vehicles) and indirect emissions from purchased energy by 2027 at the latest.
- Structured reduction pathway for upstream and downstream emissions (Scope 3): Development and implementation of a reduction pathway for emissions along the supply chain, at service providers and in the use of products by customers by 2030 and 2035, with ambitious interim targets.
- High-performance data centres and digital infrastructure: An energy efficiency target is defined for data centres and data infrastructure (especially SCANDIC DATA): a target energy efficiency (power usage effectiveness) ratio of no more than 1.25 by 2027, with continuous improvement by 2030.
- Carbon-free energy supply around the clock: Establishment of a path to a consistently carbon-free energy supply for the digital infrastructure (24 hours a day, 7 days a week), based on the best practice approaches of leading technology companies.
- Resource efficiency, water and circular economy: Reduction of water consumption – especially for cooling in data centres – and establishment of circular processes (e.g. repair, reuse, certified recycling of hardware).

2.2 Social and governance goals Human rights and supply chain: Establishing a supply chain management system that complies with international standards of due diligence, including risk analysis, prevention and remedial measures, and grievance mechanisms.

Diversity, equality and inclusion: Establishing concrete goals for diversity, equal opportunities, inclusion and fair remuneration.

Strong compliance culture and corruption prevention: Enforcement of a strict code of conduct, clear anti-corruption rules and transparent governance structures.

Data protection and information security: Implementation of an information security management system in accordance with recognised standards and active data protection principles in all products, platforms and processes.

AI ethics and media ethics (where relevant): Establishment of a special governance structure for dealing with artificial intelligence, as well as principles for media ethics responsibility, combating disinformation and transparency.

### 3. **Governance structure and responsibilities**

3.1 Overall responsibility The ultimate responsibility for this Sustainability Policy and its implementation lies with the Board of SCANDIC FINANCE GROUP LIMITED and senior management, in particular:

the management or the Executive Board of SCANDIC FINANCE GROUP LIMITED, the respective responsible management bodies of the brands in the SCANDIC brand ecosystem, insofar as they are operationally active.

3.2 Sustainability Committee (ESG Committee) For effective management, a Sustainability Committee (Environmental, Social and Governance Committee) will be established, consisting of representatives from the following areas in particular:

- climate and environment, human rights, labour, supply chain, data, information security and artificial intelligence, compliance, legal, finance and risk, human resources and culture, media and communications (where relevant).
- The committee's tasks: setting sustainability goals, priorities and measures, monitoring implementation and measuring progress, coordinating sustainability reporting, advising the board, escalating significant violations.

3.3 Policy library The Sustainability Policy is part of a comprehensive policy library that includes, among other things: - Code of Conduct, - Supplier Code, - Environmental and Climate Policy, - Human Rights and Labour Rights Policy, - Statement on Modern Slavery and Forced Labour, - Information Security Policy, - Data Protection Policy, - Responsible Disclosure of Security Vulnerabilities Policy,

- Guideline for the Ethically Responsible Use of Artificial Intelligence,
- Media and communication policy (where relevant).

### 4. **Human rights, working conditions and social responsibility**

4.1 Recognition of international standards SCANDIC FINANCE GROUP LIMITED recognises in particular:

- the United Nations Universal Declaration of Human Rights,

- the International Labour Organisation's core labour standards,
- the United Nations Guiding Principles on Business and Human Rights,
- the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises.

4.2 Principles for employees The following apply in particular to all employees within the SCANDIC brand ecosystem: - Prohibition of forced, child and bonded labour. - Prohibition of discrimination and harassment. - Safe and healthy working conditions. - Right to freedom of association and collective bargaining. - Fair remuneration and social benefits.

4.3 Complaint and whistleblower systems SCANDIC FINANCE GROUP LIMITED is setting up anonymous, confidential and multilingual complaint and whistleblower systems through which reports of violations of human rights, labour standards, environmental regulations, data protection, anti-corruption laws and other significant legal violations can be made.

The procedures ensure: - Careful, prompt and impartial investigation - Protection of whistleblowers from reprisals - Traceable documentation - Effective remedial measures - Target median processing time for complaints - Within a maximum period of fourteen days for standard cases.

## 5. **Sustainable and human rights-compliant supply chain**

5.1 Supplier code of conduct and contract design SCANDIC FINANCE GROUP LIMITED contractually obliges all suppliers and essential service providers to comply with a supplier code of conduct, which contains rules on, in particular:

- Human rights and working conditions
- health and safety,
- Environmental protection, resource consumption and emissions,
- diversity, equality and inclusion,
- data protection and information security,
- prohibition of corruption, fair competition and money laundering prevention,
- Cooperation in audits, providing information and remedial measures.

5.2 Risk analysis and prioritisation A systematic risk analysis of the supply chain is carried out, particularly in the following risk areas: - Hardware and digital infrastructure, - Data centre services and cloud infrastructure, - Media, content and creative services, - Logistics services, - Other critical services.

5.3 Preventive and remedial measures Based on the risk analysis, preventive measures are developed, such as: - specific clauses in contracts, - training for purchasers, - information material and training for suppliers, - consideration of sustainability performance in procurement.

If violations are identified, remedial measures must be taken, such as: - written warnings and deadlines, - jointly developed improvement plans, - more intensive controls, - restriction or termination of the business relationship if no improvement is made.

## 6. **Environmental, climate and resource management**

6.1 Principles SCANDIC FINANCE GROUP LIMITED is committed to the following principles:

- Priority of avoidance and reduction over compensation,
- Holistic approach along the value chain
- Transparent measurement and reporting of key environmental indicators.

6.2 Energy, data centres and digital infrastructure The following applies in particular to data centres and digital infrastructure: - Energy efficiency with target figures for energy efficiency, - Gradual conversion to electricity from renewable energy sources, - Optimisation of cooling concepts, enclosure of cold and hot aisles, virtualisation and utilisation optimisation.

6.3 Water, waste and circular economy Recording of water consumption, introduction of waste separation, reuse and recycling. Use of certified service providers for data deletion, recycling and proper disposal of hardware.

6.4 Mobility, travel and events Reduction of business air travel to the necessary minimum, promotion of video conferencing, use of efficient means of transport, establishment of internal guidelines for "avoid, reduce, compensate" for business travel.

## 7. **Data protection, information security and protection of civil liberties**

7.1 Data protection principles SCANDIC FINANCE GROUP LIMITED complies with the fundamental data protection principles of the applicable data protection laws, in particular lawfulness, purpose limitation, data minimisation, storage limitation, integrity and confidentiality, and accountability.

7.2 Information security The Group establishes an information security management system in accordance with the international standard 27001 or an equivalent recognised standard with systematic risk analysis, defined security objectives, organisational and technical measures, and regular audits.

7.3 Fundamental digital rights and civil liberties When designing products, in particular financial, media and data products, SCANDIC FINANCE GROUP LIMITED respects the fundamental rights and civil liberties of users and recognises the right to informational self-determination, freedom of expression and information, and protection from disproportionate surveillance.

## 8. **Use of technology and artificial intelligence**

8.1 Principles for artificial intelligence The use of artificial intelligence follows the principles of:

- Legality and compliance,
- Transparency and traceability,
- Human oversight,
- Protection against discrimination,
- Security.

8.2 Committees and processes Establishment of a committee for artificial intelligence governance, performance of impact and risk analyses, documentation of models, training data, intended use and control mechanisms.

9. **Corporate governance, compliance and integrity**

9.1 Code of Conduct SCANDIC FINANCE GROUP LIMITED has a Code of Conduct that applies to all employees and members of the executive bodies and regulates lawful conduct, transparent and fair business relationships, dealing with conflicts of interest, prohibition of corruption and prevention of money laundering.

9.2 Corruption prevention - Clear prohibitions on improper payments, - Training on corruption prevention, - Anonymous reporting channels, - Consistent investigation of suspected cases.

9.3 Risk management and internal control Integrated risk and control system that also covers sustainability risks, with annual risk inventory, assessment, thresholds, controls and monitoring.

10. **Employees, diversity and work culture**

- Promotion of a diverse and inclusive work culture,
- Targets for representation and fair remuneration,
- Occupational health and safety,
- Training and development programmes.

11. Stakeholder dialogue and social contribution

- Identification of key stakeholders,
- dialogue formats with customers, employees,
- suppliers, regulators and civil society,
- programmes for financial education, digital media literacy and support for educational, cultural and social projects.

12. Targets, key figures and reporting

- Setting targets for energy, emissions, supply chain,
- whistleblower system and artificial intelligence,
- reporting in a regular sustainability report in accordance with international standards,
- Gradual external review of key performance indicators.

13. Implementation, review and sanctions

- Establishment of responsibilities,
- Creation of implementation plans,
- training of employees,
- integration into management systems,
- Annual review of the policy,
- labour law measures in the event of violations,
- restriction or termination of business relationships in the event of serious violations.

14. **Final provisions**

This Sustainability Policy shall enter into force upon formal adoption by the

management of SCANDIC FINANCE GROUP LIMITED. It shall be interpreted in conjunction with the respective national legal systems. In the event of any conflict between this Policy and mandatory legal requirements, the legal requirements shall prevail.

**SCANDIC FINANCE GROUP LIMITED regards this policy as a living management tool for responsible, forward-looking and value-based corporate governance and will continue to develop it further. Drafted, signed and approved: The Board of Directors of SCANDIC FINANCE GROUP LIMITED Hong Kong, SAR-PRC, 1 December 2025 Legal counsel: Clifford Chance, Global Law Firm**