



STONK BROKERS

STONK BROKERS MiCA White Paper

Prepared with assistance from the MiCA Crypto Alliance



Index

General information	Page 3
Part A - Information about the offeror or the person seeking admission to trading	Page 4
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading	Page 5
Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Page 6
Part D - Information about the crypto-asset project	Page 7
Part E - Information about the offer to the public of crypto-assets or their admission to trading	Page 8
Part F - Information about the crypto-assets	Page 9
Part G - Information on the rights and obligations attached to the crypto-assets	Page 10
Part H - Information on underlying technology	Page 11
Part I - Information on risks	Page 12
Part J - Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts	Page 13

General information

N	Field	Content
00	Table of contents	General Information Part A: Information about the offeror or the person seeking admission to trading Part B: Information about the issuer, if different from the offeror or person seeking admission to trading Part C: Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 Part D: Information about the crypto-asset project Part E: Information about the offer to the public of crypto-assets or their admission to trading Part F: Information about the crypto-assets Part G: Information on the rights and obligations attached to the crypto-assets Part H: Information on the underlying technology Part I: Information on the risks Part J: Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts
01	Date of notification	2026-09-09
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The person seeking admission to trading of the crypto-asset is solely responsible for the content of this crypto-asset white paper.
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.
04	Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	FALSE
06	Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

Part A - Information about the offeror or the person seeking admission to trading

N	Field	Content						
A.1	Name	MiCA Crypto Alliance OpCo Limited						
A.2	Legal form	N/A as LEI is provided in A.6						
A.3	Registered address	N/A as LEI is provided in A.6						
A.4	Head office	N/A as LEI is provided in A.6						
A.5	Registration date	2025-11-19						
A.6	Legal entity identifier	984500CEB5773O38LE40						
A.7	Another identifier required pursuant to applicable national law	N/A as LEI is provided in A.6						
A.8	Contact telephone number	+44(7441)903166						
A.9	E-mail address	submissions@micaalliance.com						
A.10	Response time (Days)	030						
A.11	Parent company	N/A as LEI is provided in A.6						
A.12	Members of the management body	<table> <tr> <th>Identity</th><th>Business Address</th><th>Functions</th></tr> <tr> <td>Gabriele Gios</td><td>4th Floor Kingsway Place, Triq IR – Repubblika, Valletta, VLT 1115, MT</td><td>Director</td></tr> </table>	Identity	Business Address	Functions	Gabriele Gios	4th Floor Kingsway Place, Triq IR – Repubblika, Valletta, VLT 1115, MT	Director
Identity	Business Address	Functions						
Gabriele Gios	4th Floor Kingsway Place, Triq IR – Repubblika, Valletta, VLT 1115, MT	Director						
A.13	Business activity	Preparation and submission of white papers under the EU Markets In Crypto Assets Regulation.						
A.14	Parent company business activity	The main object of the company is to own, manage, and administer property of any kind whether belonging to the company or not. The secondary object of the company is to hold shares and, or equity in other companies.						
A.15	Newly established	FALSE						

Part B - Information about the issuer, if different from the offeror or person seeking admission to trading

N	Field	Content						
B.1	Issuer different from offeror or person seeking admission to trading	TRUE						
B.2	Name	SB (BVI) Ltd						
B.3	Legal form	6EH6						
B.4	Registered address	Suite 5, Oleander Building Port Purcell Tortola, VG1110, VG						
B.4	Country	Virgin Islands (British)						
B.4	Sub-division	Tortola						
B.5	Head office	Suite 5, Oleander Building Port Purcell Tortola, VG1110, VG						
B.5	Country	Virgin Islands (British)						
B.5	Sub-division	Tortola						
B.6	Registration date	2026-09-02						
B.7	Legal entity identifier	N/A						
B.8	Another identifier required pursuant to applicable national law	2217286						
B.9	Parent company	Not applicable						
B.10	Members of the management body	<table> <tr> <th>Identity</th><th>Business Address</th><th>Functions</th></tr> <tr> <td>Leeward (BVI) Limited</td><td>Suite 5, Oleander Building Port Purcell Tortola, VG1110, Virgin Islands (British)</td><td>Legal representative of SB (BVI) Ltd</td></tr> </table>	Identity	Business Address	Functions	Leeward (BVI) Limited	Suite 5, Oleander Building Port Purcell Tortola, VG1110, Virgin Islands (British)	Legal representative of SB (BVI) Ltd
Identity	Business Address	Functions						
Leeward (BVI) Limited	Suite 5, Oleander Building Port Purcell Tortola, VG1110, Virgin Islands (British)	Legal representative of SB (BVI) Ltd						
SB (BVI) Ltd develops and operates blockchain-based products and								

Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

N	Field	Content
C.1	Name	N/A
C.2	Legal form	N/A
C.3	Registered address	N/A
C.4	Head office	N/A
C.5	Registration date	N/A
C.6	Legal entity identifier	N/A
C.7	Another identifier required pursuant to applicable national law	N/A
C.8	Parent company	N/A
C.9	Reason for crypto-asset white paper Preparation	N/A
C.10	Members of the management body	N/A
C.11	Operator business activity	N/A
C.12	Parent company business activity	N/A
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of	N/A

Part D - Information about the crypto-asset project

N	Field	Content																
D.1	Crypto-asset project name	StonkBrokers																
D.2	Crypto-asset name	StonkBroker																
D.3	Abbreviation	STONKBROKER																
D.4	Crypto-asset project description	StonkBrokers is a crypto-asset project deployed on Robinhood Chain. The project is developed and operated by SB (BVI) Ltd. It comprises a fully minted collection of 4,444 StonkBrokers NFTs, each associated with an ERC-6551 token-bound account, and the STONKBROKER ERC-20 crypto-asset. STONKBROKER, the ERC-20 token intended to be admitted to trading, is used within the StonkBrokers ecosystem, including to acquire StonkBrokers NFTs through the AMM and to pay activation fees for participation in the StonkBrokers rewards programme. The wider StonkBrokers ecosystem includes protocol modules for NFT trading and token distributions, NFT-collateralised loans, liquidity locking, token launches through Smart Launch V2 and Stonk Launcher, and decentralised crypto-asset trading through the Stonk Exchange. It also includes Broker Box, which provides functionality relating to tokenised-stock certificates and related applications. These functions are implemented through smart contracts deployed on Robinhood Chain.																
D.5	Details of all natural or legal persons involved in implementation of crypto-asset project	<table><tr><th>Name of person</th><th>Type of person</th><th>Business address</th><th>Domicile</th></tr><tr><td>SB (BVI) Ltd</td><td>Development team</td><td>Suite 5, Oleander Building Port Purcell Tortola, VG1110</td><td>Virgin Islands (British)</td></tr><tr><td>Clutch Labs LLC</td><td>Other person involved in implementation</td><td>5184 Industrial Drive, Hurricane, Utah 84737</td><td>United States of America</td></tr><tr><td>Clutch Labs LLC</td><td>Other person involved in implementation</td><td>Panama</td><td>Panama</td></tr></table>	Name of person	Type of person	Business address	Domicile	SB (BVI) Ltd	Development team	Suite 5, Oleander Building Port Purcell Tortola, VG1110	Virgin Islands (British)	Clutch Labs LLC	Other person involved in implementation	5184 Industrial Drive, Hurricane, Utah 84737	United States of America	Clutch Labs LLC	Other person involved in implementation	Panama	Panama
Name of person	Type of person	Business address	Domicile															
SB (BVI) Ltd	Development team	Suite 5, Oleander Building Port Purcell Tortola, VG1110	Virgin Islands (British)															
Clutch Labs LLC	Other person involved in implementation	5184 Industrial Drive, Hurricane, Utah 84737	United States of America															
Clutch Labs LLC	Other person involved in implementation	Panama	Panama															
D.6	Utility Token	FALSE																

Page 7

Part E - Information about the offer to the public of crypto-assets or their admission to trading

N	Field	Content
E.1	Public offering or admission to trading	ATTR
E.2	Reasons for public offer or admission to trading	By admitting the asset to trading, holders of the token are expected to gain more transparent price discovery and improved liquidity. This is intended to enable the project's community and ecosystem participants to more easily enter and exit positions, supporting a dynamic and efficient market.
E.3	Fundraising target	N/A
E.4	Minimum subscription goals	N/A
E.5	Maximum subscription goals	N/A
E.6	Oversubscription acceptance	N/A
E.7	Oversubscription allocation	N/A
E.8	Issue price	N/A
E.9	Official currency or any other crypto-assets determining the issue price	N/A
E.10	Subscription fee	N/A
E.11	Offer price determination method	N/A
E.12	Total number of offered/traded crypto-assets	1223243158 Under the current activation mechanism, 50% of STONKBROKER paid as activation fees is burned, while the remaining 50% is allocated to the protocol by default. The circulating supply stated above excludes STONKBROKER held in the designated Escrow Reserve and reflects the amount in circulation as at the date of this crypto-asset white paper.
E.13	Targeted holders	ALL
E.14	Holder restrictions	N/A

Part F – Information about the crypto-assets

N	Field	Content
F.1	Crypto-asset type	Crypto-assets other than asset-referenced tokens or e-money tokens
F.2	Crypto-asset functionality	STONKBROKER is an ERC-20 crypto-asset deployed on Robinhood Chain and used across the StonkBrokers ecosystem. It can be transferred between compatible addresses and traded through supported markets. Within the Anvil NFT AMM, STONKBROKER is used to acquire StonkBrokers NFTs. It is also used to pay the applicable fees to activate or upgrade StonkBrokers NFTs for participation in the StonkBrokers rewards programme. Under the current activation mechanism, 50% of the STONKBROKER activation fee is burned and 50% is allocated to the protocol by default. STONKBROKER also functions as an ecosystem asset in other StonkBrokers applications. The Stonk Launcher permits launched crypto-assets to be paired with STONKBROKER, while Special Projects tokens may have liquidity paired with STONKBROKER at launch. The Stonk Exchange is live and provides decentralised trading, liquidity provision and gauge staking functionality of eligible liquidity positions within the wider StonkBrokers ecosystem. STONKBROKER may be borrowed through a collateralised borrowing mechanism available within the StonkBrokers protocol. A user may provide an eligible StonkBroker NFT as collateral and borrow a principal amount of 666,666 STONKBROKER. The borrowing fee is payable upfront in ETH and is calculated at an annualised rate of 15% by reference to the market value of the borrowed STONKBROKER expressed in ETH and the duration of the loan. A minimum loan term applies when calculating the fee. Any excess ETH provided by the borrower is refunded. Of the fees collected through the borrowing mechanism, 70% is allocated to the StockBooster mechanism and 30% to the protocol. To recover the NFT provided as collateral, the borrower must repay the principal amount of 666,666 STONKBROKER. Where repayment is overdue, an additional late fee is payable in ETH at the same annualised rate. The borrowing arrangement is a separate functionality of the StonkBrokers protocol. STONKBROKER is the crypto-asset borrowed and repaid under that arrangement. Holding STONKBROKER does not, in itself, create a right to receive interest, repayment or other payments from a borrower. STONKBROKER will be also designated as the governance token of the Stonk Exchange. The StonkBrokers documentation states that holders are to direct which pools, routes and ecosystem programmes receive directed flow.
F.3	Planned application of functionalities	Governance functionalities are planned to be implemented in future phases of the project development.
F.4	Type of crypto-asset	OTHR

Part G - Information on the rights and obligations attached to the crypto-assets

N	Field	Content
G.1	Purchaser rights and obligations	Not applicable. Holders of STONKBROKER do not, solely by acquiring or holding STONKBROKER, acquire any ownership, equity, profit participation, repayment, redemption or compensation rights against SB (BVI) Ltd or any other natural or legal person. Holding STONKBROKER does not give rise to contractual claims or entitlements against SB (BVI) Ltd or any other natural or legal person. Accordingly, the functionalities associated with STONKBROKER are functional and protocol-based. These include the ability to hold, transfer and trade STONKBROKER on Robinhood Chain, use STONKBROKER to acquire StonkBrokers NFTs through the AMM, and use STONKBROKER in connection with activation and other ecosystem functions. These functionalities are further described in F.2.
G.2	Exercise of rights and obligations	Not applicable as the asset confers no ownership or financial claims and does not impose any legal obligations.
G.3	Conditions for modifications of rights and obligations	Not applicable as the asset confers no ownership or financial claims and does not impose any legal obligations.
G.4	Future public offers	Not applicable
G.5	Issuer retained crypto-assets	N/A
G.6	Utility Token Classification	FALSE
G.7	Key features of goods/services of utility tokens	N/A
G.8	Utility tokens redemption	Not applicable
G.9	Non-trading request	TRUE
G.10	Crypto-assets purchase or sale modalities	Not applicable
G.11	Crypto-assets transfer restrictions	Not applicable
G.12	Supply adjustment protocols	FALSE

Part H – Information on underlying technology

N	Field	Content
H.1	Distributed ledger technology	N/A as DTI is provided in F13
H.2	Protocols and technical standards	Networking, transport and session STONKBROKER transaction submission uses Robinhood Chain's network interfaces rather than a token-specific networking layer. Public mainnet endpoints include a JSON-RPC address, a WebSocket sequencer feed and a direct sequencer endpoint. These are rate-limited and Robinhood recommends managed providers such as Alchemy, QuickNode, Blockdaemon, dRPC and Validation Cloud for production use. A wallet or application submits a signed transaction through an RPC service, and the sequencer receives and orders it for Layer 2 execution. Independently operated full nodes which are computers that download and independently verify the chain's complete transaction history, rather than relying on Robinhood's own infrastructure, run Offchain Labs' Nitro software, the client Robinhood Chain is built on. Running one requires two separate connections to the Ethereum network: an execution endpoint, which supplies ordinary account and transaction data, and a beacon endpoint, which supplies consensus data and is also needed to retrieve blob data – a lower-cost, temporary data-storage format that Ethereum provides specifically to support Layer 2 networks like Robinhood Chain. Ledger Robinhood Chain's ledger state is account-based and Ethereum-derived: token balances, contract storage and other state are processed by the sequencer and ultimately settle against Ethereum. The chain posts transaction data to Ethereum and uses Ethereum blobs for data availability, so a full node depends on both an Ethereum execution endpoint and a beacon endpoint capable of retrieving blob data to reconstruct and verify state. STONKBROKER's own balances exist as entries in the CollectionToken contract's storage within this ledger, rather than in an issuer-maintained off-chain register. Execution The deployed CollectionToken contract was written in Solidity, the programming language used for most Ethereum-style smart contracts, using version 0.8.26 and compiled for the Cancun upgrade of the Ethereum Virtual Machine (EVM), the shared rulebook that determines what a smart contract can do and how much it costs to run. It was compiled with an optimisation setting of 200 runs, a standard trade-off that increases contract size slightly in exchange for lower gas costs on functions used often. Robinhood Chain also allows larger contracts than Ethereum mainnet and provides Arbitrum-specific precompiles, built-in, ready-made functions any contract can call, comparable to a shared code library, for Layer 2-specific tasks such as reading the current Layer 2 block number or gas price. Execution and finality occur in stages. The sequencer first accepts, orders and executes a transaction, returning a soft confirmation, typically within under a second. Robinhood Chain orders transactions on a first-come, first-

Part I – Information on risks

N	Field	Content
I.1	Offer-related risks	Market volatility and speculative-value risk STONKBROKER's price is set entirely by public trading on decentralised and centralised exchanges rather than by any backing asset, cash flow or redemption right, and it can move sharply on limited volume. The project's own materials describe several of its core mechanics, including Broker Box and Stonk Launcher's buyback draws, in explicitly chance-based terms, with disclosed theoretical payout rates. This speculative, game-adjacent design increases the likelihood of pronounced price swings that are unrelated to any change in the underlying technology. Execution and slippage risk STONKBROKER is tradable across multiple venues, including several decentralised exchange pools on Robinhood Chain (Uniswap V3, Uniswap V4, up. and other automated market makers) and on centralised exchanges. Execution quality depends on the liquidity available in the specific venue and pool used for a trade, and a trade can execute at a less favourable rate than quoted where liquidity is thin or prices move before the transaction is confirmed.
I.2	Issuer-related risks	Dependency risk STONKBROKER's continued use within the StonkBrokers ecosystem depends on SB (BVI) Ltd and other entities associated with the project continuing to operate and develop the Anvil NFT AMM, the Stonk Exchange, and the other StonkBrokers applications through which STONKBROKER is spent. These applications are developed and maintained by a single named operator rather than by a decentralised or redundant set of parties. If any event were to cause these entities to cease operations, restructure, or discontinue development of these applications, the STONKBROKER-denominated functions they provide could become unavailable, even though the underlying ERC-20 contract described in Part H would continue to operate independently of any application built on top of it.
		Transaction finality and irreversibility risk Robinhood Chain's sequencer cannot modify, reverse or cancel a transaction once it has been submitted. An erroneous STONKBROKER transfer, an approval granted to an incorrect address, or a transaction executed on the basis of mistaken instructions cannot be corrected through any protocol-level reversal. Private-key custody risk Robinhood Chain's services are non-custodial, and holding or using STONKBROKER depends on the holder's own wallet and the cryptographic credentials that control it. Loss or compromise of a private key or seed phrase results in permanent loss of control over the associated STONKBROKER holdings, with no recourse to Robinhood, SB (BVI) Ltd or any other party. Supply and contract-parameter reliance risk

Part J - Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts

N	Field	Content
Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism		
General information about adverse impacts		
S.1	Name	MiCA Crypto Alliance OpCo Limited
S.2	Relevant legal entity identifier	984500CEB5773038LE40
S.3	Name of the crypto-asset	Stonkbroker
S.4	Consensus Mechanism	STONKBROKER does not participate in consensus through a token-specific validator or block-production mechanism; transactions involving the token execute within, and inherit the settlement guarantees of, Robinhood Chain. Robinhood Chain's sequencer initially orders transactions, returning a soft confirmation typically within under a second. The sequencer then batches transactions and posts the batch to the Ethereum Layer 1 inbox, which fixes ordering subject only to an Ethereum reorganisation; this stage typically takes minutes. Full finality is reached once the Ethereum block containing the batch itself finalises on Ethereum, typically around thirteen minutes after posting, at which point the transaction inherits Ethereum's security and is irreversible. Robinhood Chain additionally uses BoLD for dispute resolution, under which its permissioned validator set can challenge an invalid state assertion, as described in H.3. Ethereum's own consensus is proof-of-stake. Time is divided into twelve-second slots and epochs of thirty-two slots, and one validator is randomly selected to propose a block in each slot. A validator joins by depositing 32 ETH into the network's deposit contract, and validator committees vote on proposed blocks through attestations. Checkpoint finality, governed by the Gasper mechanism, requires votes representing at least two-thirds of total staked ETH across two successive checkpoints before the earlier of the two becomes finalised; Gasper combines Casper-FFG finality with the LMD-GHOST fork-choice rule, which favours the fork with the greatest accumulated weight of attestations. Validators who equivocate, submit contradictory attestations or contradict earlier checkpoint votes can be slashed, losing part or all of their staked ETH and being removed from the active validator set; reverting a finalised Ethereum block would require destroying at least one-third of total staked ETH. This layered arrangement gives STONKBROKER transactions distinct confirmation levels: the sequencer provides a soft confirmation for everyday use, posting to Ethereum establishes ordering again after an Ethereum reorganisation, and Ethereum finality provides the settlement finality. Canonical withdrawals from Robinhood Chain back to Ethereum are

MiCA Crypto Alliance

The MiCA Crypto Alliance is a leading collaborative initiative simplifying regulatory compliance across the crypto industry. We provide verified sustainability data and write MiCA-compliant white papers to help token issuers, CASPs and crypto projects meet their disclosure obligations under MiCA.

This Alliance focuses on standardising compliance efforts among its members, offering exclusive resources like sustainability indicators and white paper elaboration tools tailored to meet MiCA requirements. By leveraging the collective expertise of its members, the MiCA Crypto Alliance will help reduce the complexities and costs associated with compliance, while setting a high standard for transparency, market integrity, and consumer protection. For more information on joining the MiCA Crypto Alliance, please see the details below.

Visit: **micacryptoalliance.com**

Contact us: **contact@micacryptoalliance.com**