

GOVERNANCE ACTION / TREASURY WITHDRAWAL

Cardano Strategic Copper Reserve

₳22,000,000 | Real-World Asset (RWA) Tokenization | COMEX Grade 1 Copper

DRep governance proposal • On-chain recipient: Toto Finance Inc. (U.S.) • Proposed independent oversight: U.S. PwC member firm (not engaged) • 14 October 2026

FROM DIGITAL ASSETS TO THE REAL ECONOMY: CARDANO'S OPPORTUNITY IN TOKENIZATION.

Tokenization is creating a new model for capital markets: real-world assets (RWAs) can be represented on blockchain networks, connecting physical ownership and independently verified reserves with programmable financial infrastructure. The strategic question for Cardano is how to become a meaningful platform for this emerging asset economy—not merely a venue for digital-native tokens.

The Cardano Strategic Copper Reserve proposes a concrete answer. Through a one-time ₳22 million Treasury Withdrawal, Toto Finance Inc. would acquire independently verified U.S. COMEX Grade 1 copper cathodes and tokenize the metal as CuTT, with one CuTT economically representing one verified pound of copper. The initiative aims to establish an auditable copper-backed RWA reserve on Cardano while developing reusable tokenization, reporting and ecosystem infrastructure. Its purpose extends beyond a single asset: to demonstrate how Cardano can connect institutional-grade physical commodities with transparent digital ownership and future decentralized finance applications.

The proposal combines this strategic ambition with a finite financial mandate: approximately 66.93% of the request is allocated to copper acquisition, the remaining 33.07% to disclosed technology, custody, assurance, execution and oversight costs; 100% of realized net physical-sale proceeds and unused or unearned funds must be returned to the Cardano Treasury by month 36. Copper prices, ADA exchange rates, fees and execution create material risks, and neither principal recovery nor profit is guaranteed. The ambition is to help establish Cardano as infrastructure for the tokenization of the real-world economy—starting with copper.

MANDATE	BINDING TERM
On-chain governance action	One-time Treasury Withdrawal of exactly ₳22,000,000 (22,000,000,000,000 lovelace) to Toto Finance Inc. at stake1uxmfznssglftuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax; Toto Finance is the named accountable on-chain recipient/project administrator.
Asset	COMEX Grade 1 electrolytic copper cathodes, ASTM B115; U.S. warehouse in greater New Orleans / Westwego, Louisiana
Reserve unit	1 CuTT = 1 verified avoirdupois pound (0.45359237 kg) of allocated physical copper
Cardano RWA tokenization	Verified copper is tokenized as CuTT (one economic unit per independently attested pound). The Treasury-financed active CuTT representation is held on Cardano under documented reserve protections; independently reviewed cross-chain supply conservation prevents double-

MANDATE	BINDING TERM
	counting. Full technical architecture appears in section 5.
Custody / use	Toto Finance holds title to independently verified COMEX Grade 1 copper, with Treasury-benefit security and release controls to be documented before procurement. Treasury-funded Cardano bridged CuTT is held in identified reserve custody with independently established protections before deployment. DeFi is open for separately financed CuTT; any Treasury-reserve risk-taking needs separately authorized safeguards.
Lifecycle	18–24 months hold; price-sensitive realization period of 1–12 months; absolute maximum 36 months
Financial protection	Toto Finance is named on-chain recipient and accountable administrator. Independent U.S. PwC member-firm oversight is proposed, NOT engaged; an alternative independent provider may be appointed. 3% oversight allowance; future legal/security/audit milestones before related spending.
Treasury outcome	Return 100% of realized net physical copper-sale proceeds and unused or unearned budget balances via auditable ADA Treasury donations by month 36; no guaranteed principal or profit. Deliver reusable Cardano real-world asset tokenization infrastructure and public reporting.

Governance decision requested — purpose, impact and accountability

The decision before Cardano governance is whether to authorize a one-time $\text{\$}22,000,000$ Treasury Withdrawal that combines physical commodity tokenization, reusable Cardano RWA infrastructure and a defined return-of-proceeds obligation. Toto Finance Inc., a U.S. corporation, would receive the funds at the designated Cardano mainnet reward address

`stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax` and serve as the accountable project administrator. The program would acquire independently verified COMEX Grade 1 copper, establish legally documented custody and Treasury-benefit security controls, tokenize the verified reserve through CuTT, and maintain the Treasury-funded active representation on Cardano. The intended strategic outcome is a public, auditable demonstration of tokenized real-world assets connected to Cardano; the financial outcome is measured by the actual net proceeds returned after controlled physical sales. The proposed 18–24-month holding period is followed by liquidation and return of all net physical-sale proceeds and unused or unearned budgets by month 36. The $\text{\$}22\text{M}$ includes $\text{\$}14,724,409$ for copper, $\text{\$}2,640,000$ (12% gross) for independently milestone-accepted Toto Finance technology/project management, $\text{\$}3,533,859$ for capped physical operations and assurance, $\text{\$}441,732$ for execution, and $\text{\$}660,000$ for future independent professional oversight. A U.S. PwC member firm is a preferred prospective oversight provider, not engaged. All relevant legal, independent custody, assurance and technical security arrangements are future pre-deployment conditions. Neither full principal recovery nor profit is guaranteed.

GOVERNANCE STATUS: Toto Finance Inc. is the named Cardano Treasury Withdrawal recipient and accountable project administrator; its reward address is `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. Toto Finance confirms $\text{\$}0$ of Cardano Treasury funding received during the preceding 24 months. Independent professional oversight is proposed, not engaged; a U.S. PwC member firm is a preferred prospective provider, not a confirmed partner. Warehouse/title/security documentation, independent audits and technical security review are future pre-deployment conditions, not executed contracts. The receiving address must be reconfirmed in the submitting wallet before signing.

1. GovTool fields — RWA tokenization title and abstract

Title: Cardano Strategic Copper Reserve | $\text{\$}22\text{M}$ RWA Tokenization

Abstract: Tokenization of real-world assets (RWAs) offers Cardano an opportunity to connect blockchain infrastructure with the physical economy. The Cardano Strategic Copper Reserve requests a one-time $\text{\$}22,000,000$ Treasury Withdrawal to Toto Finance Inc., U.S.-based recipient and accountable administrator, to acquire independently verified COMEX Grade 1 copper cathodes in a COMEX-approved U.S. warehouse and tokenize the metal as CuTT. One CuTT economically represents one verified pound of eligible physical copper; the Treasury-financed active token representation will be held on Cardano under documented reserve protections. The initiative aims to deliver auditable physical backing, transparent reserve and token-supply reporting, cross-chain tokenization infrastructure, and a practical Cardano RWA reference model. The program targets an 18–24-month hold, followed by controlled copper liquidation and return of 100% of realized net physical-sale proceeds plus unused or unearned budgets to Cardano Treasury by month 36. Of the $\text{\$}22\text{M}$, $\text{\$}14,724,409$ (66.93%) is allocated to copper; $\text{\$}2,640,000$ (12%) to milestone-accepted Toto Finance technology/project management; $\text{\$}3,533,859$ to external operations/assurance; $\text{\$}441,732$ to execution; and $\text{\$}660,000$ to independent administration. A qualified independent oversight provider is to be appointed; a U.S. PwC member firm is preferred but not engaged. Toto Finance reports $\text{\$}0$ prior Cardano Treasury funding in 24 months. The receiving mainnet reward address is `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. No original ADA principal, copper appreciation, token adoption or profit is guaranteed; legal, custody, audit and security controls are required before the relevant deployment.

2. Strategic rationale — why tokenization, copper and Cardano matter

TOKENIZATION AS A STRATEGIC CARDANO OPPORTUNITY. Real-world asset (RWA) tokenization connects verifiable economic value with programmable financial networks. For Cardano, the opportunity is to demonstrate how physical commodities can be independently verified, digitally represented, transparently reported and governed through a defined financial lifecycle. This proposal is intended to position Cardano as infrastructure for the tokenization of the real-world economy, rather than to suggest that token issuance alone creates economic value.

WHY COPPER. Copper is essential to electrification, power grids, industrial reshoring, transport infrastructure and AI data-center construction. COMEX Grade 1 cathodes provide an identifiable physical asset class with recognized quality specifications and warehouse documentation. The proposed CuTT tokenization model links each independently attested net pound of eligible copper to one economic CuTT unit, with independent reserve controls and public supply reconciliation. Long mining lead times and changing supply conditions can affect prices, but scarcity and appreciation are

not guaranteed. The program's distinctive proposition is an auditable physical RWA demonstration, not a speculative copper-price promise.

WHY A TREASURY RESERVE. The project aims to produce reusable Cardano RWA infrastructure, public backing proofs, technical developer documentation, reserve dashboards, and verifiable financial disclosures, alongside a time-limited allocation to physical metal. The Treasury-financed active CuTT balance will be held on Cardano under reserve controls, while separately financed CuTT may support broader lawful DeFi and tokenized commodity applications. All net physical-sale proceeds and unused or unearned budgets are committed for return to the Treasury by month 36, subject to market and execution outcomes. The Cardano x Draper Dragon Orion Fund is a relevant precedent for return-oriented ecosystem capital; this proposal does not claim to be the first such initiative. Any comparison with established gold-backed tokens such as PAXG and XAU_T is conceptual only and does not imply equivalent investor rights, liquidity or regulatory approvals.

Why DReps should consider the RWA tokenization opportunity

STRATEGIC POSITIONING — Tokenization of real-world assets creates a potential new market for Cardano infrastructure. A verifiable copper-backed RWA can demonstrate a practical connection between physical commodities, digital asset representation and transparent governance. This is an intended demonstration, not a guaranteed market position.

TANGIBLE, VERIFIABLE BACKING — The proposed reserve uses independently verified, physically deliverable COMEX Grade 1 U.S. copper cathodes. One CuTT economically corresponds to one eligible verified pound; copper must be acquired, documented and subject to independent controls before Treasury-financed issuance.

REUSABLE RWA INFRASTRUCTURE — Funded deliverables include tokenization engineering, a Cardano-side active CuTT representation, independently reviewed escrow and bridge controls, public metal-to-token reconciliation, developer documentation and reserve reporting. Future integrations and adoption remain uncertain.

CAPITAL DISCIPLINE — The reserve has a finite 36-month term and an obligation to return 100% of net physical-sale proceeds and unused or unearned budgets to Treasury. This is a return-of-proceeds undertaking, not a fixed-interest loan or guarantee of original ADA principal.

ACCOUNTABILITY AND TRADE-OFFS — The budget separates copper (66.93%) from technology, external operations, execution and independent oversight (33.07%). Related-party compensation, audits, custody protections, bridge risk and copper/ADA sensitivity are disclosed so DReps can evaluate both the strategic upside and the material financial risks.

3. Specific constitutional basis

This proposal addresses the Cardano Constitution Article II §§6–7 by specifying the ADA amount, designated reward address, purpose, cost caps, project administrator, 24-month funding disclosure, refund and return policy, audit funding, independent oversight plan and publication requirements. The receiving entity is Toto Finance Inc., which reports ~~£~~0 prior Cardano Treasury funding in the last 24 months. Current Net Change Limit headroom, constitutional guardrails and exact CIP-108 anchor

bytes must be checked at the time of actual on-chain submission. A future independent PwC engagement is not presented as a prerequisite already fulfilled or an existing relationship.

REQUIREMENT	EVIDENCE IN FINAL SUBMISSION
Article II §6(1)–(2)	Final immutable and hashed proposal/metadata; title, abstract, motivation, rationale, linked technical/legal evidence.
Article II §7(1)	₳22M exact amount; physical copper purpose; max 36-month delivery; budget; conditional release; mandatory refund/exit triggers.
Article II §7(2)	Toto Finance Inc., the named on-chain Treasury recipient, declares ₳0 of Cardano Treasury ADA received in the 24 months preceding this proposal.
Article II §7(3)	Reconfirm unused NCL at ratification and activation; this action cannot exceed remaining allowable NCL.
Article II §7(4)	Dedicated annual independent audit line item and performance metrics with quarterly disclosure.
Article II §7(5)	Toto Finance Inc. is the named accountable legal-entity recipient and project administrator; a qualified independent professional oversight provider (preferably a U.S. PwC member firm if engaged) will be appointed before relevant disbursements. This proposed future appointment is disclosed as unconfirmed.
Article II §7(6)	Undisbursed Treasury ADA received by Toto Finance must remain in segregated, auditable accounts, with applicable Abstain governance delegation and no SPO delegation, subject to the Cardano Constitution. Independent enforcement arrangements are a pre-deployment milestone.
Appendix I Treasury-02a/03a	Check NCL cap and denominate the withdrawal in ADA, not USD or USDC.

4. Participants, ownership and custody

On-chain Treasury Withdrawal Recipient and accountable administrator. Toto Finance Inc., a U.S. corporation, is the designated recipient and named accountable project administrator for the ₳22M withdrawal. Its Cardano mainnet reward address for the withdrawal is `stake1uxmfznssglftuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. The corresponding Toto Finance ADA payment address provided for wallet funding is `addr1qxxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpdkj98pq37knemvdlcvmn3hc2uum20vu7zy7p0c36vfygs09fkl0`. These two address types have distinct functions. Toto Finance confirms it has received ₳0 from Cardano Treasury in the 24 months preceding this proposal. The entity will be responsible for auditable segregation of funds, budget control, procurement documentation, independent-assurance engagement, reserve reporting, refund and Treasury-donation reconciliation. This proposal does not claim that PwC or Intersect controls this wallet.

Proposed independent professional administration and 3% allowance. A U.S. PwC member firm is the preferred independent professional administrator or oversight provider, subject to a separate future engagement, service scope, independence review and written acceptance; none is claimed at submission. The A\$660,000 (3% of A\$22M) ceiling is reserved for a single suitably independent provider and related approved oversight services, payable only for accepted work. If PwC is unavailable, Toto Finance will seek another qualified independent provider; Intersect MBO is an option only with its own agreement, not an automatically appointed fallback or on-chain recipient. Unused/unearned administration allowance must be returned to Treasury. Until independent controls are actually established, Toto Finance is the on-chain fund controller and must not imply third-party custody.

Execution operator and legal metal owner. Toto Finance Inc., a Delaware corporation, purchases identifiable COMEX Grade 1 cathodes, holds legal title as warehouse depositor and undertakes tokenization, compliant service procurement and price-sensitive physical liquidation under the approved program and independent oversight controls once established. Ownership is not free and clear of project obligations: a first-priority collateral package covering the identified copper, warehouse instruments, insurance recoveries and net proceeds is to be perfected for Treasury economic benefit before purchase. Toto Finance cannot lend, dispose of, pledge to others or re-use these metal lots during the hold, except for independently authorized liquidation. Toto Finance compensation, TOTO-token utility settlement and related-party conflicts are expressly disclosed and controlled.

Warehouse title, insolvency safeguards and collateral. The independently verified COMEX-approved warehouse will issue binding and auditable title/receipt records for each reserve lot in the greater New Orleans area; Toto Finance remains the recorded metal owner until lawful transfer. Security documentation will provide the independent collateral agent, acting for Treasury economic benefit, enforceable priority, control and default-remedy rights over metal, title documents, insurance claims and sale proceeds. On a default or Toto Finance insolvency, independent U.S. counsel and the collateral agent may direct lawful delivery or sale under effective security and warehouse agreements and applicable bankruptcy rules. Warehouse metal does not automatically transfer to a blockchain Treasury solely by reason of insolvency. Recovery timing and amount cannot be guaranteed; independent U.S. legal sign-off is a pre-acquisition condition.

Storage and custodian. The copper is planned to be held as documented, independently verifiable, lot-allocated stock in a COMEX-approved U.S. warehouse in the greater New Orleans area. The commercial warehouse name is intentionally not disclosed publicly at this stage. Before metal acquisition, Toto Finance, the appointed independent assurance provider and collateral counsel must verify COMEX approval, custody/release restrictions, warehouse receipts, insurance and legal title. No warehouse agreement or stock ownership is represented as existing at submission.

Audit-provider independence. Toto Finance must procure independent third-party financial and metal-assurance services, physical verification, and separate Ethereum escrow/Cardano bridge security review as funded project deliverables. These engagements and their results are required before the related physical purchase, issuance or production deployment, not before governance proposal submission. A future independent PwC oversight provider must not be represented as auditing its own work; assurance provider independence and conflicts must be assessed and disclosed.

CME publishes storage and handling rates for COMEX-approved New Orleans-area copper warehouses, including approximately \$15.00–\$15.50 per U.S. short ton per month for indoor storage in 2026, before insurance and other handling fees. These are market reference rates, not agreed contracts or evidence that capacity has been secured. Actual fees and eligibility will be verified before contracting. [Source S5]

5. COMEX Grade 1 specification and 1:1 CuTT issuance

Eligible metal: electrolytic copper cathodes conforming to ASTM B115 Grade 1, and otherwise meeting COMEX physically deliverable copper specifications. Each standard copper futures delivery lot is nominally 25,000 lb with a $\pm 2\%$ weight tolerance (24,500–25,500 lb). For direct physical purchases, the program targets whole-lot equivalents; the governing token supply always equals the independently verified *actual net pounds* owned by the reserve, not a presumed number of contracts. No derivative futures position is counted as copper backing until physical ownership/title is confirmed. [Source S3]

CuTT ("Cu" = the chemical symbol for copper; "TT" = Total Tokenization, the Toto Finance technology framework) is a fungible token with one CuTT economically referenced to one actual independently attested pound of specified COMEX Grade 1 copper. The private-law rights associated with ownership, custody, redemption and secured enforcement are defined by the signed token terms and warehouse documentation; the token code alone does not create title. A COMEX contract lot is nominally 25,000 lb; minting quantity is the actual verified net weight rather than an automatic nominal lot amount.

Only purchased, lien-reviewed and independently attested physical pounds may back canonical Ethereum CuTT issuance. The ENTIRE Treasury-financed issuance is committed to an audited, non-rehypothecatable Ethereum lock-and-mint bridge escrow before its matching Cardano CuTT representation becomes usable. Each locked Ethereum CuTT backs no more than one spendable bridged Cardano CuTT, and the Cardano policy prevents unauthorized additional minting; locked Ethereum balances are excluded from freely circulating supply and cannot be used for further collateral or bridging. The Treasury's bridged Cardano balance is independently controlled during the approved hold. Toto Finance may mint additional CuTT on Ethereum or another chain only after acquiring and attesting different copper lots, tracked with distinct reserve identifiers and globally conserved liabilities. Other CuTT holders may participate in lawful DeFi; the secured Treasury-funded tranche may not be unilaterally pledged or put into loss-bearing DeFi.

Ethereum escrow, specialized Cardano bridge and supply conservation

LOCK-FIRST ROUTE — (1) Verify COMEX warehouse title, exact eligible pounds and insurance. (2) Mint no more than one canonical Ethereum ERC-20 CuTT per attested pound. (3) Transfer the whole Cardano Treasury-funded ERC-20 tranche to a purpose-built, independently audited Ethereum bridge escrow with controlled release authority and verifiable locked supply. (4) Following finality and proof verification, mint an equal number of Cardano bridged CuTT native-asset units under a dedicated policy, sending all units to the identified administrator-controlled Cardano reserve payment address. (5) Display the Cardano custody balance, Ethereum locked escrow, verified warehouse pounds, and consolidated total claim count in one dashboard. The Ethereum escrow units remain on Ethereum and can be seen on-chain, but are not spendable or separately counted as circulating exposure.

REVERSE ROUTE / TERMINAL BURN — When authorized physical copper is sold, Toto Finance and the independently appointed assurance/control parties must coordinate cancellation of equivalent bridged Cardano units, verifiable Ethereum escrow release and burn/retirement of the related canonical units, or an independently reviewed legally equivalent burn sequence. No metal may be released in a way that leaves unbacked economic token liabilities outstanding. Reverse transfers and any Cardano bridge remint must obey supply-conservation and audited release controls.

FUTURE ISSUANCE OUTSIDE THE CARDANO RESERVE — Toto Finance is free to expand separately funded CuTT supply on Ethereum and other supported networks, subject to separate verified physical copper acquisition and full global backing. The Cardano Treasury-financed warehouses, warrants, metal lots and escrow units must not be reused to collateralize those new units. The reserve-wide accounting invariant is: total freely spendable economic CuTT claims across networks may not exceed the actual eligible, independently verified pounds; bridged escrow-locked canonical units do not count twice. Legal token-holder redemption and ownership rights must be independently documented.

CuTT DeFi interoperability, operator authority and economic rights

OPEN FUNGIBLE ASSET / DEFI ROADMAP — CuTT is intended as a programmable, fungible copper-backed instrument that may be integrated with lending and borrowing markets, collateral and margin systems, liquidity pools, DeFi staking programs, vaults, structured products and other lawful protocols. Toto Finance Inc. controls product design, integrations, commercial partnerships, fee schedules and deployment across supported chains, independently of this finite Cardano Treasury procurement mandate. Any application-level CuTT staking does not constitute native Cardano stake-pool staking of ADA.

TOTO FINANCE DEFI COMMERCIAL ECONOMICS — Toto Finance Inc. retains the platform and commercial economic rights to its CuTT DeFi operations. All net operating profits, platform fees, origination and administration income, integration revenues and other contractually earned DeFi business proceeds accrue to Toto Finance, not the Cardano Treasury. Cardano Treasury economic recovery under THIS action consists instead of the net realizations from its separately secured physical copper tranche and recoveries/unused balances expressly described elsewhere in this action. This commercial carve-out is a material related-party disclosure and does not waive third-party CuTT holders' enforceable token rights.

SEPARATION OF TREASURY-FUNDED RESERVE — The Cardano-financed CuTT representation is to be held in identified reserve custody with independently documented protections established before minting. Toto Finance retains broad authority to build and monetize DeFi activity for non-Treasury CuTT and other separately financed collateral, but it cannot unilaterally lend, pledge, rehypothecate or expose the Treasury-financed reserve to loss-bearing DeFi without additional approved legal protections and any necessary governance authority. Before those safeguards are contracted, they are future deliverables, not existing restrictions enforceable against third parties.

POTENTIAL FUTURE RESERVE USE — If a specific DeFi use of Treasury-tranche CuTT is later proposed, it cannot proceed under the general operator-authority clause alone. Prior independent administrator and collateral-counsel approval, enforceable no-impairment protections, auditable risk controls and legally required authorizations must be obtained; any material change to the governance-approved purpose, rights, profit distribution or risk exposure may require a new Cardano

governance action. There is no guaranteed DeFi yield, no assumed lending income in the ₳22M budget, and no permission to weaken the 36-month sale-and-return deadline.

6. On-chain/off-chain execution and public proof of reserves

1. The Cardano Treasury action designates Toto Finance Inc. as the recipient of exactly ₳22,000,000 at the Cardano mainnet reward address `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. Toto Finance is the accountable project administrator and must maintain separately identified, publicly auditable Treasury ADA balances pending authorized deployment. The proposal requires applicable Abstain governance delegation and no SPO delegation for administrator-held undisbursed ADA as required by the Constitution. Toto Finance will seek independent oversight by a U.S. PwC member firm, subject to engagement; no independent administrator currently controls the receiving wallet. Copper purchases, bridge issuance and DeFi reserve use remain conditional on independently documented custody, legal and security controls.
2. Toto Finance obtains two independently sourced purchase indications for independent review, verifies COMEX Grade 1 eligibility, settlement currency conversion, title, lot weights, liens and actual delivered value before payment.
3. Toto Finance authorizes no more than ₳14,724,409 of the withdrawal for physical copper procurement, converts to an appropriate settlement currency via independently reviewed venues, and publishes ADA/USD price, transaction costs and recipient receipts. Budget-controlled TOTO-token purchases are permitted ONLY against authentic storage/insurance invoices under the distinct fee policy in section 7; there is no authorization to accumulate TOTO as an investment asset or to market-support its price.
4. Toto Finance Inc. acquires legal title to individually identified copper lots, deposited in the selected COMEX-approved New Orleans-area facility. Security interests, warehouse receipts/warrants, controlled release rights, insurance and independent metal attestations are confirmed before CuTT is minted. No future or derivative position counts as 1:1 backing until eligible physical metal and title are confirmed.
5. Only verified net eligible pounds trigger canonical Ethereum CuTT issuance. Toto Finance and the appointed independent verifier must document the FULL Treasury tranche's transfer into audited Ethereum escrow and matching, not duplicative, mint of the bridged Cardano CuTT representation into a controlled Cardano reserve wallet. The original Ethereum tokens remain locked, visible but not independently tradable or lendable. The Cardano token balance is the only active representation of the Treasury-funded tranche. These are future implementation requirements, not existing deployed contracts or verified reserves.
6. Toto Finance publishes monthly metal-to-CuTT backing and Cardano/Ethereum supply reconciliations, quarterly independent physical/financial attestations and annual independent audit reports, together with an auditable project dashboard and archive tracking eligible copper weight, title/security evidence, bridge escrow balances, Cardano bridged supply, ADA spending and Treasury returns. An independent assurance provider will be appointed as a funded milestone; PwC US is a potential independent oversight provider, not a current project partner. Public RWA-directory listings and press coverage are targets, not guarantees.

7. After the approved hold the independent sale committee executes competitive physical sales. For each sold lot, it coordinates warehouse/title release, the burn of matching Cardano bridged CuTT, unlock/burn of underlying Ethereum escrow tokens and confirmation that the remaining physical and token liabilities reconcile 1:1. Sale proceeds enter administrator-controlled accounts, are converted into ADA when necessary and returned to the Cardano Treasury via an auditable on-chain Treasury-donation process. Unused budget balances are also returned.

7. Budget — fixed ceiling of A\$22,000,000

The A\$22M withdrawal is allocated across FIVE NON-OVERLAPPING CEILINGS: (1) A\$14,724,409 for independently verified COMEX Grade 1 physical cathodes; (2) A\$441,732 one-time conversion/execution compensation to Toto Finance (approximately 3% of copper principal), earned only against accepted metal/title; (3) A\$3,533,859 for up to 36 months of external warehouse, insurance, independent metal/financial audits, third-party security reviews, collateral/compliance and other clearly defined physical-reserve operations (equivalent to approximately 8% annually of copper principal); (4) A\$2,640,000 (exactly 12% of the full A\$22M request) payable to Toto Finance for CuTT technical development, Cardano bridging and ecosystem delivery, AND distinct project-management services, solely in stages upon independent milestone certification; and (5) A\$660,000 for the independent future independent professional administrator if it accepts (otherwise preappointed Intersect MBO), capped at 3% of the withdrawal. These fees are disclosed related-party compensation where applicable. The 12% Toto fee does not cover independent audit, commercial warehouse charges, external insurance, legal/collateral services or independent administrator services; those cannot be invoiced again through the technology contract. TOTO-based warehouse utility payments and the up-to-30% warehouse/insurance invoice administration margin are fully contained within the A\$3,533,859 external operating ceiling, not charged on top. All unspent and unearned funds revert to Treasury.

BUDGET ITEM	FORMULA / PURPOSE	ADA	%
Physical copper acquisition	Verified COMEX Grade 1 cathodes and acquisition basis	14,724,409	66.93%
One-time execution / conversion	Approx. 3% × physical copper principal	441,732	2.01%
Physical custody / external audits / operations	8% p.a. × 3 years × copper principal; excludes Toto project-management/development	3,533,859	16.06%
Toto Finance Cardano technology + project management	12% × gross A\$22,000,000, subject to independently certified milestone tranches	2,640,000	12.00%
Independent professional oversight / administration	3% × gross A\$22,000,000; U.S. PwC member firm proposed, not engaged	660,000	3.00%
TOTAL AUTHORIZED		22,000,000	100.00%

BUDGET ITEM	FORMULA / PURPOSE	ADA	%
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WITHDRAWAL

Amounts are maximum 36-month authorization caps, not invoices already incurred or irrevocable retainers. Copper comprises 66.93% of total funding; 33.07% is allocated to disclosed execution, physical-reserve operations, independent assurance/oversight and Toto Finance's 12% development/project-management contract. The 30% Toto service margin applies ONLY to genuine independent warehouse-storage/handling and physical-insurance invoices, sits WITHIN the 8%-annualized operations envelope and is not chargeable on development/management milestones. No expense may be charged to multiple categories. Toto Finance will appoint independent invoice and milestone reviewers before making the relevant related-party disbursements.

SUB-COMPONENT	RATE ON COPPER	36-MONTH CAP (ADA)
Independent physical/financial/metal audits	1.20% / year	530,079
Third-party COMEX warehouse storage and handling	1.50% / year	662,598
Third-party physical copper insurance	0.60% / year	265,039
Toto handling margin (30% of above two external invoices)	0.63% / year	278,291
U.S. legal, compliance, collateral and tax	0.60% / year	265,039
Independent bridge security audit, penetration testing	1.00% / year	441,732
External collateral administration, independent valuation, reserve-assurance platform and operating contingency; excludes Toto project management	2.47% / year	1,091,081
TOTAL EXTERNAL OPERATING CEILING	8.00% / year	3,533,859

FEE DISCLOSURE — A future independent professional administrator/oversight provider may earn up to ₺660,000 (3% gross), only if contracted and services accepted. Toto Finance may earn up to ₺441,732 (3% of copper principal) for completed procurement/execution and a separately capped ₺2,640,000 (12% gross) for Cardano technology and project management against independently certified milestones. Toto Finance may additionally earn up to ₺278,291 as a disclosed 30% margin on actual third-party storage/insurance invoices, entirely within the operating cap. No undisclosed performance carry, TOTO dealing subsidy or additional withdrawal is authorized.

Separate 12% Toto Finance development + project management — scope and deliverables

The 12% technology-development and project-management allocation equals exactly ₺2,640,000 of the ₺22M withdrawal and is payable to Toto Finance Inc. under independently accepted milestones. Deliverables include canonical Ethereum CuTT ERC-20 code and escrow; audited Ethereum lock/verification events; dedicated Cardano bridged-asset mint/burn policy and transfer adaptor; no-

double-count global supply proofs; administrator Cardano reserve wallet infrastructure; reserve proof-of-assets/proof-of-liabilities dashboard; audit-readiness and secure API integrations; Cardano-facing RWA tracking submissions and technical documentation; Reeve-oriented on-chain financial reporting integration where feasible; independent testing and smart-contract/bridge remediation; and project coordination through final closing. This fee is DISTINCT from the maximum 8%-annualized, 36-month warehouse, physical insurance, independent audits, third-party assurance, legal and other physical operations budget. Development funding is not a disguised commodity purchase expense and not a guarantee that optional integrations or exchange listings will be accepted.

MILESTONE A (20% / ₳528,000): signed engineering architecture, legal claim model, custody/escrow and supply-invariant specification, Reeve reporting feasibility plan. MILESTONE B (25% / ₳660,000): canonical Ethereum CuTT ERC-20, Ethereum escrow lock tests, Cardano bridged mint-policy testnet and reproducible tests. MILESTONE C (25% / ₳660,000): independent security review/remediation, production Ethereum escrow and Cardano bridge, no-duplicate-supply tests and documented incident responses. MILESTONE D (20% / ₳528,000): independently verified Cardano reserve address balances, live reconciled public reporting/dashboard, agreed Reeve integration or auditable Cardano-ledger reporting equivalent, RWA index submission evidence, and administrator acceptance. MILESTONE E (10% / ₳264,000): independently tested maintenance/closeout, audited final supply cancellation and handover by month 36. Administrator approval is required before each milestone payment; payment does not follow automatically from time elapsed.

To avoid double charging, the ₳2,640,000 Toto Finance engineering/project-management contract shall not duplicate the separate ₳3,533,859 maximum (8% annually × 36 months) expense allowance for physical storage, insurance, financial/metal audits, collateral/compliance, third-party assurance and security reviews. Toto Finance cannot certify its own milestones: a qualified independent reviewer must be appointed before milestone payments. Toto Finance must preserve unearned funds for refund. The technology budget excludes TOTO price support, buybacks, unrelated Ethereum expansion, founder distributions and governance-voter payments. The 30% warehouse/insurance margin is limited to eligible independently verified third-party invoices.

Warehouse and insurance costs: TOTO utility-fee settlement

TOTO is the separate Toto Finance ecosystem utility token. It is NOT CuTT, not the copper collateral, and not a Treasury investment asset. The purpose of using TOTO is to demonstrate an on-chain utility settlement path for physical custody charges, not to support TOTO's market price or to finance unapproved token purchases. Warehouse operators remain paid in USD under their commercial contracts.

CONTROLLED FLOW — (1) COMEX warehouse or licensed insurer issues a verifiable USD invoice; (2) a contracted independent reviewer validates the service, rate and budget; (3) only the approved amount of Toto-controlled Treasury ADA is exchanged for TOTO at transparent market/oracle rates within agreed slippage limits; (4) TOTO is transferred to Toto Finance's auditable warehouse-fee settlement wallet; (5) Toto Finance promptly converts TOTO into USD through approved venues and pays the warehouse/insurer, retaining only its disclosed eligible margin. These controls must be operational BEFORE any such related-party token conversion; direct fiat payment is the fallback.

CONFLICT SAFEGUARDS — Toto Finance and TOTO stakeholders benefit economically from market activity. This related-party exposure is expressly disclosed. Transactions must use fair-market execution, published independent price references, no wash trading or exchange-volume targets, no preferential undisclosed issuer allocation, no price-support mandate, separate fee wallets, preapproved counterparties, maximum notional equal to actual eligible expense and public reporting of fees, spreads and impact. TOTO price volatility, illiquidity, taxable events and two-legged swap costs remain program risks. Any unspent TOTO must be returned, converted back under independent approval, or otherwise reconciled at fair value.

CAPS — The third-party warehouse/handling allowance is A662,598 over 36 months; external insurance is A265,039; maximum Toto Finance administration margin on actual invoices is A278,291. These are sub-components of the fixed A3,533,859 external operating budget; separate from the 12% Toto Finance Cardano technology/project contract, not extra Treasury withdrawals. They remain subject to actual contract prices and independent verification. Token execution slippage and operating costs must also fit within that fixed cap, with direct USD payment fallback if the TOTO route is uneconomic or noncompliant.

8. Deployment milestones, timing and full liquidation deadline

TIME	MANDATORY ACTION	REPORT / CONTROL
Month 0–2	Funds received; procurement and independent title verification; physical copper acquisition and initial CuTT backing	Source-of-funds, purchase and FX audit; independent reserve attestation; public dashboard
Months 1–18	No reserve sales, lending, rehypothecation or token distribution; recurring assurance and budget monitoring	Monthly collateral proof, quarterly assurance, annual independent financial/physical audit
Months 18–24	Optional controlled under independent reserve protections to be implemented beginning of orderly liquidation at documented price/value triggers; otherwise continue holding	Monthly sale-committee minutes; independent benchmark comparison and fund-return receipts
Month 24	Latest permitted start of regular liquidation process; remaining reserve enters liquidation plan regardless of spot price	Board/administrator-approved sale schedule and buyer execution controls
Months 24–36	Sell remaining position over 1–12 months based on price and liquidity; do not exceed 36-month terminal limit	Monthly sold lbs, proceeds, fees, ADA donations and unsold lbs
Month 36 maximum	All copper sold and CuTT retired; proceeds/unused ADA returned; final independent audit and legal closeout	Final reconciled Treasury donation evidence; final audited program report

Timing interpretation: the physical position is initially held for at least 18 months and no more than 24 months before liquidation commences. A staged 1–12-month sale may start as early as month 18, but if it starts after month 24 the remaining time to the absolute month-36 completion date applies. Toto Finance may accelerate sales for risk management or unforeseen legal/custody hazards only under a documented independent approval process established before copper acquisition; exceptions must be promptly disclosed. An indefinite extension or repeat financing is NOT approved.

9. Price-sensitive liquidation policy — disciplined discretion

Sale decisions will use publicly available COMEX high-grade copper references, *net executable U.S. physical bids* and warehouse/logistics/FX-adjusted realization. The committee may scale out into favorable prices while protecting against leaving the entire reserve exposed near deadline. Indicative \$8/lb, \$9/lb and \$10/lb levels are analysis scenarios, not promises or mechanical thresholds: a public sale plan is adopted by month 18, quarterly updated, and the administrator must maintain enough liquidity and time to complete by month 36.

The independent sale committee will use documented competing bid procedures, restricted affiliate trades, and at least two market references where feasible. Sales to related parties require independent pricing evidence and prior conflict approval. The final 12-month window progressively reduces discretion: a minimum documented cumulative liquidation schedule shall be set at activation, and at least 25% of original pounds by month 30, 60% by month 33 and 100% by month 36 must be sold or be subject to pre-agreed binding delivery/settlement, unless a force-majeure court order legally prevents performance. These are minimum guardrails; faster realization is permitted. Any force majeure requires public incident notice and best-efforts recovery, not an automatic extension of the approved term.

Each physical sale triggers independent warehouse/title and Ethereum/Cardano CuTT supply reconciliation. Exactly the corresponding sold metal claims are extinguished or converted under legally approved rules; unsold pounds remain 1:1 covered. All net physical disposal proceeds, permitted recoveries and every unspent or unearned budget balance will be returned to the Cardano Treasury through traceable ADA-denominated treasury-donation transactions. No additional upside participation, performance carry, undisclosed metal spread or special exit fee is authorized. This is a return-of-proceeds undertaking, not a guaranteed repayment of A\$22M or a contractual interest rate.

10. Market thesis — evidence, not guaranteed appreciation

As of 14 October 2026, the proposer's delayed COMEX December 2026 reference was approximately \$6.73/lb ($\approx$ \$14,837/t); accessible Oct 14 historical quotes subsequently showed approximately \$6.69/lb, illustrating intraday variation. The proposer's ~19.5% 2026 year-to-date number compares indicative year-end/front-month references rather than a continuous investable total return; it must not be interpreted as guaranteed or directly comparable to a matched physical-copper basis. The reported September intraday peak around \$6.83/lb also requires matching contract/time verification. [S7]

SOURCE / DATE	PUBLIC OUTLOOK	$\approx$ USD/LB	SIGNIFICANCE
Deutsche Bank / 28 Sep 2026	Up to \$22,050/t in Q2 2027	\$10.00	High-upside scenario linked to stockpiling and supply shifts; outside this program's earliest typical liquidation date if starting late 2026.
J.P. Morgan / 21 Aug 2026	\$14,800/t in Q4 2026; 2027 avg \$13,800/t	\$6.71 / \$6.26	Mixed/constructive medium-term demand but no automatic multi-year increase.
Goldman Sachs / 23 Jan 2026	\$11,200/t in Q4 2026; fair value ~ \$11,500/t	\$5.08 / \$5.22	Bearish counter-scenario: tariffs and U.S. stockpiling may unwind.

SOURCE / DATE	PUBLIC OUTLOOK	≈ USD/LB	SIGNIFICANCE
Goldman Sachs / 11 Dec 2025	\$15,000/t by 2035	\$6.80	Long-run grid/power investment case; not a 2028–2029 exit-price forecast.

Supportive factors: mine project development can take many years; grid and data-center investments increase electrical copper intensity; constraints in mine output and processing can limit near-term supply; U.S. import-policy incentives can redirect copper into American warehouses. Countervailing factors: abundant U.S. exchange inventories, tariff-premium mean reversion, global surplus in some forecasts, substitution with aluminum, slowing Chinese demand, scrap supply response and high financing/custody costs. [S6–S10]

Market predictions are cited as opinions of their respective analysts, not as independent endorsements of the Cardano project. Deutsche Bank's stated Q2 2027 \$10/lb call is not a forecast of the copper price at the program's potential 2028–2029 sale date. This temporal mismatch is a material risk that must be acknowledged to DReps.

11. Transparent return sensitivity — fees, ADA and principal risk

For illustration only, assuming copper is acquired at an all-in \$6.73/lb, ADA/USD does not change, every authorized fee cap is fully spent, and zero additional physical-sale basis costs occur, the metal must appreciate by approximately 49.41%, to about \$10.06/lb, to recover A\$22M of value in ADA. Only A\$14,724,409 (66.93%) acquires copper. The other 33.07% is transparently divided among the 3% independent administrator allocation (A\$660,000), roughly 3% metal execution (A\$441,732), three-year external operations/assurance (A\$3,533,859), and the separate 12% Toto Finance Cardano development/project-management fee (A\$2,640,000). The maximum 30% invoice margin for warehouse/insurance is INSIDE the external operating allocation, not on top. Thus a Deutsche Bank \$10/lb bullish scenario would still be marginally below full original ADA recovery under these intentionally conservative full-spend assumptions, even before additional fees and FX moves; no dividend, yield, guaranteed principal or ADA-neutrality is promised. Unspent fees and smaller actual expenditures improve the result; ADA appreciation, custody costs and sale discounts can worsen it.

ILLUSTRATIVE EXIT PRICE	ADA RECOVERY VS. A\$22M	NET VS. GROSS ADA REQUEST
\$5.00/lb	49.7%	-50.3%
\$6.73/lb	66.9%	-33.1%
\$8.00/lb	79.6%	-20.4%
\$9.00/lb	89.5%	-10.5%
\$10.00/lb	99.4%	-0.6%
\$10.06/lb	100.0%	+0.0%

ILLUSTRATIVE EXIT PRICE	ADA RECOVERY VS. A22M	NET VS. GROSS ADA REQUEST
\$12.00/lb	119.3%	+19.3%

The scenario is illustrative, not investment advice or a forecast. The Cardano Treasury holds exposure to changes in the COMEX/physical copper price and ADA/USD. A rising copper price does not ensure rising ADA recovery; ADA appreciation and authorized fees can more than offset metal appreciation. The \$2,640,000 technology/programming fee is an authorized expense, not a Treasury cash return. CuTT publicity, RWA directory presence, external Ethereum CuTT issuance and TOTO fee-settlement trading contribute ZERO assumed yield to the reserve. Only actual net metal disposals, verified recoveries and unused funding count as Treasury returns.

12. Governance, audit independence and public performance dashboard

Dual authorization. Independent administrator control is required for material ADA disbursement, acquisition settlement, warehouse-document changes, insurance renewal, copper release, TOTO utility swaps and bridge security actions. Separate custody, tokenization and collateral representatives hold nonoverlapping permissions; Toto Finance alone cannot authorize warehouse releases or collateral changes. In addition, the 12% Toto Finance technology/program-management budget requires an accepted statement of work, milestone evidence, independent technical acceptance and anti-self-approval segregation; Toto Finance staff cannot approve their own invoices.

Administrator custody. Toto Finance is the designated on-chain recipient and accountable administrator. While it holds undisbursed Treasury ADA, those funds must be in segregated, publicly auditable Cardano accounts delegated to Abstain for governance and not delegated to any stake-pool operator, as required by the applicable constitutional provision. Independent custody or third-party veto authority does not exist until separately implemented.

Reserve audits. Independent physical inventory confirmations at inception and at least quarterly, with annual financial and warehouse-title audits. Reconcile CuTT canonical and bridged supply every month and after each disposal.

Independent technical checks. Before token launch, audit both canonical Ethereum CuTT ERC-20 and the special Ethereum-escrow-to-Cardano bridge: verify escrow balances, finality proofs, Cardano mint/burn policy, access and upgrade roles, global supply invariant, replay/overflow risks, suspension mechanisms, emergency recovery, oracle integrity and reverse-route retirement. Independent reviewers must test that locked Ethereum CuTT is not another active circulating claim.

Reconciliations. Public dashboards and independent assurance will show: verified warehouse copper pounds and lots; eligible Grade 1 certificate references; insurance and encumbrance attestations; Ethereum CuTT total minted, locked escrow amounts and any unrelated separately backed outstanding Ethereum units; active Cardano bridged CuTT supply and administrator-controlled holdings; cross-network claim supply without double-counting; physical mark-to-market value and sale-progress statistics; approved ADA/TOTO/USD invoice settlement, execution prices and the Toto 30% invoice margin; the separate 12% Toto engineering/project-management payments and certified milestones; independent audit opinions; sale receipts and ADA Treasury-donation references.

Confidential warehouse business terms may remain private to the administrator, professional auditors and counsel.

Public reporting and RWA discovery. Toto Finance will publish monthly reserve/bridge supply statements, quarterly DRep-facing verified metal and financial reports, and annual independent financial, title and custody audit opinions once the relevant project phases begin. Toto Finance will provide Cardano explorer references, bridge supply proofs, RWA token data/metadata and open technical interfaces suitable for trackers and developers. RWA-directory acceptance and media coverage are targets, not guarantees. Reeve integration is proposed, not yet agreed with the Cardano Foundation.

Reeve: Cardano-native auditable financial disclosure

The program proposes integrating Reeve, the Cardano Foundation financial-reporting product, to make selected auditable general-ledger and reserve-program disclosures verifiable on Cardano. The design will publish authenticated commitments or entries for budget receipt and release, administrator-approved copper purchases, physical inventory confirmations, storage/insurance invoices, TOTO settlement legs, separate Toto technology milestones, physical realization, expenses and final Treasury donations. The reporting approach must preserve necessary trade confidentiality and personal data protections while allowing DReps and auditors to verify published proofs.

Reeve is an intended technical integration, NOT evidence of a confirmed Cardano Foundation partnership, product-access entitlement, professional assurance opinion or guarantee of deployment. Administrator and Toto Finance shall seek the necessary technical access, evaluate its ERP/accounting integration and obtain any required license/approval. If Reeve integration is unavailable, the obligation to publish equivalent verifiable, timestamped hashes and auditable financial disclosures on Cardano remains; this substitution does not reduce the independent audit requirements, reporting cadence or total ₳22M ceiling. Source S24: <https://cardanofoundation.org/blog/unveiling-reeve-enterprise-reporting>

Escalation. Any mismatch >0.1% of eligible pounds or material unverified warehouse claim suspends mint/bridging and payments pending independent resolution; theft, loss or audit qualification triggers immediate administrator review.

PERFORMANCE METRIC	MINIMUM / PASS CONDITION
Physical 1:1 coverage	Every active spendable CuTT claim (on Cardano or any other chain) must be backed by at least one distinct verified net pound. Ethereum units locked to support bridged Cardano units are excluded from circulating economic claims; 1:1 backing and no double count verified by independent reconciliation.
Reporting frequency	Monthly public reserve reconciliation; quarterly independent attestation; annual financial/title assurance
ADA governance	Toto-controlled undisbursed Treasury ADA must remain in segregated auditable accounts, with required Abstain governance delegation and no SPO delegation. Toto Finance reward address: stake1uxmfznssglftuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax

PERFORMANCE METRIC	MINIMUM / PASS CONDITION
Physical metal controls	Treasury-funded COMEX metal cannot be lent, pledged to other creditors or rehypothecated; external, independently financed CuTT remains DeFi-integratable. Administrator approval required for any collateral-affecting action.
Budget	All five funding categories inside ₳22M with independent payment approvals; the 12% Toto Finance tech/program contract separately milestone-accepted and never duplicated in the 8% external annual physical operating budget; TOTO invoice margin capped at 30% inside external operations.
End of term	100% of copper legally disposed and 100% corresponding economic CuTT liabilities retired by month 36
Treasury returns	Every sale and unused-budget return evidenced by on-chain ADA donation or an auditable documented treasury-credit method

13. Refunds, early termination and failure handling

The independent administrator shall return uncommitted/unspent ADA if lawful physical copper procurement cannot be completed within 90 days of program activation, and all unused/unearned budget balances after final close, including the unpaid portion of the 12% technology/project-management contract. TOTO purchased but not needed for approved warehouse invoices must be independently reconciled and returned/converted; Toto may not treat Treasury-controlled TOTO balances as an unrestricted corporate asset. If a metal acquisition fails, funds remain segregated; an independently approved replacement is allowed only within unchanged asset-quality, budget and time limits.

Toto Finance must suspend new disbursements and initiate independent review, restitution, replacement or controlled liquidation upon title/security failure, COMEX ineligibility, unverified 1:1 CuTT backing, insurance lapse, material TOTO settlement abuse, bridge compromise, sanctions/regulatory illegality, material fraud or operator insolvency. The independent collateral agent and counsel to be appointed before copper acquisition must receive enforceable warehouse-release and recovery rights for Treasury economic benefit. These rights are subject to U.S. insolvency proceedings and creditor priority rules; no automatic transfer of metal title upon insolvency is guaranteed.

If the governance action fails or expires without enactment, no ₳22M is withdrawn; the submitting wallet's governance-action deposit is handled by protocol refund rules. If essential legal, independent assurance, warehouse or bridge controls cannot be implemented after enactment, Toto Finance must halt the affected expenditures and arrange return of unused funds to Treasury according to the approved refund policy. The Toto-controlled receiving wallet is not represented as third-party escrow.

If the approved return period ends, all realized net copper sale proceeds and unused/unearned budget balances are returned via documented Cardano Treasury donations by month 36.

14. Risks, conflicts and legal/regulatory review

RISK	CONTROL / ACKNOWLEDGED RESIDUAL
COMEX–LME basis and tariffs	Mark underlying metal to net local executable bids; maintain both U.S. and international reference prices. Tariff premium may vanish.
Copper declines / delayed price rebound	No guaranteed principal; mandatory terminal sale by month 36, regardless of target.
ADA/USD and conversion	Document rate, counterparties, slippage and resulting ADA recovery; pre-agreed risk limits; no speculative derivatives unless separately authorized (not authorized here).
Warehouse/title, lender liens	Toto legal title, warehouse receipt and first-priority security documentation plus independent COMEX custody verification; statutory liens and bankruptcy stays may impede enforcement.
Ethereum bridge / Cardano representation	Canonical CuTT minted on Ethereum then locked in auditable special-purpose escrow; matching Cardano native representation minted one-for-one into controlled custody. Independent smart-contract and mint-policy reviews, pausability, permission management, event/finality proofs, reverse burns and supply conservation required. Exploits, outages, failures and bridge counterparty losses remain possible.
CFTC/SEC, AML, commodities/property law	Obtain written U.S. legal opinions on spot physical delivery, token claims, custody, settlement, cross-border and sale characterization before acquiring metal.
Operator conflicts / fees	~~A~~ 2.64M Toto technology/project fee plus conversion fee and a 30% warehouse/insurance invoice margin create material related-party economic interests. All payable services require administrator approval, observable market pricing, milestone sign-offs, audit trails and no double charging. No guarantee of Cardano ecosystem benefits or USD/ADA principal.
Illiquidity / forced liquidation	12-month flexible sales and sale-committee targets, but mandatory exit date may require accepting unfavorable bids.
Fee load	Only 66.93% initially buys copper. Maximum 33.07% of gross withdrawal funds disclosed fees, external expense caps, proposed independent administration and the separate 12% Toto Cardano technology/project delivery contract. Full-spend metal breakeven is ~+\$49.4% in USD copper at constant ADA/USD before other basis costs; fees and engineering may prevent positive Treasury returns despite bullish copper.
TOTO utility-token routing and related-party risk	ADA-to-TOTO and Toto Finance TOTO-to-USD swaps require independent approval, exact USD invoice, public exchange rates, tight slippage budget, KYC, no discretionary purchases, audit reconciliation and fiat fallback. Tokens can fall sharply and counterparties can fail.
Marketing, index inclusion and reputational risk	RWA listings, media coverage, exchange integrations and “first” claims are not guaranteed. PwC is named solely as a potential future U.S.

RISK	CONTROL / ACKNOWLEDGED RESIDUAL
	oversight provider; no appointment, endorsement or partnership may be implied. Verified milestones must precede any claim of delivery.
Liability and non-waivable legal duties	No market-price guarantee or personal guarantee by directors/shareholders merely for their role. Fraud, gross negligence, willful misconduct, misappropriation, contractual security breaches, unlawful acts and other non-waivable duties remain subject to enforceable law and contracts.
DeFi leverage / lending / protocol risk	Independent CuTT ecosystem can develop lending, collateral and application-level staking; treasury-funded metal and its CuTT representation must not enter loss-bearing lending, rehypothecation or competing liens without separate administrator authorization and preserved collateral safeguards. DeFi revenue belongs to Toto Finance; Treasury receives no guaranteed yield.
Reeve/reporting integration and financial transparency risk	Reeve access, permission, compatibility, deployment and publication are not guaranteed. Toto Finance must implement an independently auditable Cardano-ledger reporting fallback without requiring further Treasury funding; publication is no substitute for financial and physical audits.

Related-party and conflicts disclosure. Toto Finance Inc. is the for-profit metal owner, on-chain Treasury recipient, accountable project administrator, tokenization operator and beneficiary of expressly disclosed execution compensation, 12% Cardano development/project-management payments, and invoice-based storage/insurance service margin; TOTO is a separate related utility token. This concentration of roles is a material conflict. An independently appointed reviewer must approve all Toto/TOTO-related disbursements BEFORE execution and disclose end-to-end rates, beneficial counterparties, market benchmarks and genuine invoices. No Treasury funding may be used for TOTO price support, artificial trading volume or undisclosed related-party transfers.

15. Net Change Limit and governance voting snapshot

As of the DRepTalk period tracker checked on 14 October 2026: the 2026–27 NCL for epochs 613–713 is ₳500,000,000; enacted withdrawals total ₳457,395,629; indicative remaining headroom is ₳42,604,371. If no other relevant withdrawals are enacted first, this ₳22M action would leave ₳20,604,371. This is a *snapshot*, not a reserved allocation or guarantee of ratification. Recheck NCL, pending actions and the current protocol parameters immediately before submitting and throughout voting. [S2]

The action is a Cardano Treasury Withdrawal, not an Info action or Project Catalyst request. It requires the then-applicable DRep voting threshold and Constitutional Committee ratification; SPOs do not vote on this action class. GovTool's example page displays 67% DRep support but current protocol parameters prevail. The refundable governance-action deposit has been documented as ₳100,000 but can change by governance; check live before signing. [S11–S12]

16. DRep diligence — preemptive responses

Why use Ethereum if this is a Cardano project?

Canonical ERC-20 CuTT is issued FIRST on Ethereum and moved into a purpose-built, independently audited Ethereum lock escrow; an equal quantity of bridged Cardano CuTT is then issued under a verifiable minting policy to a dedicated Cardano reserve wallet subject to the independently documented controls. Thus the Treasury-financed tranche has its only active spendable token balance on Cardano even though its locked originals remain publicly visible in Ethereum escrow. This is not Cardano-native-first issuance or a second metal claim. Later separately backed CuTT can remain on Ethereum or other networks with distinct metal inventory. These contracts and custody controls are future project deliverables.

What strategic value does Cardano receive beyond the copper position?

The intended Cardano deliverables include a tokenized, independently verifiable real-world asset; a controlled active CuTT representation on Cardano; reusable reserve reporting and metal-to-token reconciliation; audited cross-chain controls; and developer documentation for future RWA integrations. The Treasury also receives a documented economic claim supported by the proposed collateral framework and a commitment to return net physical-sale proceeds. This is an opportunity to demonstrate Cardano infrastructure in commodity tokenization, not a guarantee of ecosystem adoption, RWA listings or original ADA principal recovery.

Why do fees and technology development use 33.07% of the withdrawal?

The maximum non-metal share is 33.07%: independent administrator 3% of gross, execution ~3% of metal, up to 8% per year on metal for external physical operations and assurance, and Toto Finance 12% of gross for separately delivered Cardano technology and project management. The 30% margin on actual warehouse/insurance invoices is a subcomponent of external operations, not a separate 30% fee. The technology contract is paid across five verifiable technical milestones, excludes unrelated Ethereum expansion and is subject to independent approval and refunds for nondelivery. This fee load requires copper prices to rise about 49.41% for gross principal recovery under the full-spend, constant-ADA/USD illustration; more modest returns or outright losses are possible.

Why not just retain ADA?

Holding ADA avoids physical warehouse, basis and operational risks, related-party TOTO settlement, and the cost of engineering. CuTT represents a conscious, limited-duration investment in copper and Cardano RWA infrastructure rather than a claim of certain financial superiority. DReps must evaluate the \$2.64M developer/project deliverables on technical merit and measure actual net Treasury recovery against the forgone ADA alternative.

May Toto Finance deploy CuTT in DeFi and retain the profits?

Yes for independently financed/non-Treasury CuTT and the commercial protocol businesses Toto Finance builds: the fungible CuTT token is designed for lending, collateral, application-level staking and other DeFi services, and all net commercial DeFi business profits and protocol fees belong to Toto Finance under its product contracts. No interest, staking or loan income is pledged as Cardano Treasury return by this action. This does not grant Toto unilateral authority to pledge, rehypothecate

or endanger the Treasury-funded copper and secured CuTT tranche. Any exposure of Treasury collateral requires independent approval and legal controls protecting priority, 1:1 backing and the final recovery schedule.

Why not sell CuTT to retail immediately?

Treasury-financed CuTT is locked in the Cardano-controlled reserve during the investment hold and is not sold to retail. Copper may be tokenized outside this tranche on Ethereum with separate purchase financing and independently allocated collateral, but no expansion can encumber, transfer, sell, or reuse Cardano-purchased copper. RWA directory indexing and Cardano-visible proof of reserves provide discovery without an obligation to make the Treasury position freely transferable.

Who can move the warehouse metal?

Toto Finance Inc. is intended to hold legal title as depositor of identified warehouse lots. Before any copper acquisition, warehouse documentation, perfected first-priority Treasury-benefit security and independently enforced release controls must be executed and verified. An appointed independent secured-party representative may then exercise lawful enforcement rights on default or insolvency, subject to applicable bankruptcy and collateral law. No existing perfected lien or executed custody mandate is claimed at submission.

What if \$10/lb never occurs?

The \$10 analyst scenario is not the exit trigger. A staged sell-down is mandatory and all remaining copper must exit by month 36 even below purchase cost.

Can the proposal be changed after DReps vote?

No material terms can be changed by a mutable web page. An immutable and hashed final off-chain proposal is the authoritative representation of the on-chain action; a new action may be needed for scope change.

What if the copper is lost or a custodian becomes insolvent?

Insurance, COMEX-approved custody and identified title records reduce physical/custodian risks but cannot eliminate them. Secured-party protections and independent counsel provide recourse; bankruptcy stays, liens, exclusions and litigation can delay or impair recovery. Public reporting will disclose material exceptions.

What happens to Cardano's ADA donations?

Return transactions use Cardano's designated Treasury-donation mechanism, with references and independent reconciliations; they are not generic transfers to an `addr1...` payment address.

Does routing warehouse fees through TOTO expose Treasury funds to a related-party token?

Yes. TOTO is economically related to Toto Finance and its liquidity may be volatile. The ADA→TOTO→USD fee path is disclosed but may operate only after independent invoice controls, execution limits, market price checks, public reconciliation and bank receipts are implemented. No TOTO investment, price support or discretionary trading is authorized. When the path is not lawful,

liquid or economical, Toto Finance must use the independently approved direct-flat warehouse/insurer payment fallback.

Why would financial media care?

A verifiable Cardano-governed allocation into COMEX Grade 1 copper, tracked through 1:1 CuTT representation and followed by returned Treasury proceeds, has an intelligible global real-world-asset narrative alongside existing tokenized-gold benchmarks. Public milestones include first metal purchase, independent proof of reserves, Cardano bridge activation, RWA tracker submissions and final Treasury donations. This is a communications opportunity, not a price, listing or earned-media guarantee.

Is this the first Cardano Treasury investment with capital returns?

It is a proposed pioneering physically backed COMEX copper reserve with a short, explicit liquidation and return timeline. The Cardano x Draper Dragon Orion Fund had a capital-return component and was enacted in 2026, so categorical “first-ever return” statements are not supportable. Present the distinct CuTT structure and measured novelty instead of an unverified absolute claim.

Legal risk allocation, no guaranteed yield, and liability boundaries

GENERAL RISK ACKNOWLEDGMENT — This governance request is not investment advice or an offer of guaranteed returns. The initial ₳22M is not insured against market loss and is not principal-protected. Cardano Treasury might receive less than ₳22M or, in an adverse case, no economic recovery. Outcomes depend on copper market prices, COMEX/U.S. tariff and warehouse basis, physical liquidity, ADA/USD FX, fund and custody counterparties, bank insolvency, fraud, theft, handling and insurance exclusions, regulatory restrictions, bridge/smart-contract hacks, oracle errors, TOTO token conversion/slippage and insolvency enforcement outcomes. DeFi-specific risks include smart-contract exploits, oracle manipulation, liquidation events, borrower default, collateral price gaps, slashing or protocol penalty where applicable, liquidity freezes, bridge outages, cyber incidents, regulatory change and counterparty insolvency. Toto Finance commercial profit entitlement does not remove its enforceable contractual duties to the Treasury.

LIMITATION OF RECOURSE — Shareholders and directors of Toto Finance Inc. do not personally guarantee investment performance or the return of the ₳22M solely by reason of their status. Toto Finance Inc. shall not be responsible for bona fide external market losses or outcomes outside its contractual control to the extent permitted by applicable law and the signed commercial agreements. This does NOT release Toto Finance or any person from liability that applicable law prohibits waiving, or from fraud, willful misconduct, gross negligence, misappropriation, material breach of contract, failure to maintain contracted security/custody duties, knowingly false reporting, unauthorized asset transfers or other non-excludable statutory or fiduciary obligations. The 12% technology/project-management fee is payable only after verified contractual milestones; failure of agreed delivery triggers non-payment, repayment of advances where legally required and enforceable remedies, subject to signed terms. Market-outcome disclaimers do not excuse failure to deliver funded technical work.

NO WAIVER OF TREASURY PROTECTION — The proposal requires a first-priority copper security package, independent collateral agent, enforceable release controls and independent audits to be

implemented before metal acquisition or CuTT issuance; these safeguards are not yet contracted. Nothing authorizes the eventual security to be subordinated, excuses return of net sale proceeds or unspent funds, or waives legally non-excludable duties. Binding indemnity, exclusive remedy, governing law and liability caps require separate executed counsel-reviewed documents. Any DeFi use risking Treasury collateral requires additional legal protections and, where necessary, governance authorization.

LOSS REPORTING — Toto Finance, as accountable recipient and project administrator, shall publish timely material incident disclosures, activate the independent response protocols established before deployment, preserve evidence, consult regulators and counsel as applicable, and provide independently reviewed recovery and Treasury distribution accounts. No open-ended Treasury replenishment is requested.

17. Final on-chain submission checks and post-approval implementation milestones

- **Recipient and accountability** — Toto Finance Inc. is the designated U.S. legal-entity recipient and accountable administrator. It declares \$0 of Cardano Treasury ADA received in the prior 24 months. Designated mainnet reward address:
stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax. The proposal does not depend on PwC or Intersect receiving ADA. Any PwC US independent oversight appointment is conditional and must not be described as executed.
- **Wallet and on-chain submission** — Before signing, independently verify the Toto Finance Ledger-controlled reward credential
stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax and the submitting wallet's actual deposit-return credential; they may coincide if the submitting wallet supports governance-action signing. Do not substitute the ordinary
addr1qxxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpgkj98pq37knemvdlcvmn3hc2uum20vu7zy7p0c36vfys09fkl0 payment address for the Treasury Withdrawal reward address. The \$100,000 governance deposit plus fees is required by the submitting wallet; confirm live protocol parameters.
- **Pre-deployment legal/custody milestones** — After governance approval and before committing copper acquisition funds, independently validate the selected COMEX-approved warehouse, insurance, title/warehouse instruments, Treasury-benefit security arrangements, controlled release and independent physical verification. Do not represent contracts as signed until executed.
- **Pre-deployment independent assurance** — Before relevant payments, issuance or deployment, appoint independent financial/metal assurance providers and appropriate legal counsel. Engage a U.S. PwC member firm for proposed oversight only if it agrees; no PwC acceptance or endorsement is asserted.
- **Pre-deployment technology** — Complete canonical Ethereum CuTT contract, Ethereum escrow lock, specialized Cardano bridge mint/burn policy, Cardano token custody and independently reviewed security controls as project milestones. None is falsely described as live or audited today.
- **Operating controls** — Before deployment of ADA/TOTO/USD utility settlement or any copper-related related-party payment, adopt auditable invoice approval, market conversion pricing, wallet segregation, conflict controls and unused-balance recovery.

- Exit controls — Before copper acquisition, adopt an independent sale-review mandate, sell-down timetable, bank proceeds control and auditable Cardano Treasury-donation process, with mandatory project closure by month 36.
- Publication gate — When the proposal text and metadata are approved, publish the exact final PDF and CIP-108 JSON-LD at immutable URLs and verify the BLAKE2b-256 metadata anchor hash before submitting the on-chain action. These URLs and the hash cannot exist until the final bytes are hosted.
- Governance gate — Recheck current Net Change Limit headroom, enacted and pending withdrawals, applicable governance voting thresholds, constitutional guardrails and governance-action deposit immediately before signing.
- Public credibility — The on-chain recipient and its address are Toto Finance Inc. and stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax. Future PwC, warehouse, auditor and bridge arrangements are identified as planned deliverables, not existing endorsements or contracts. Publish verified proof only once actually available.

18. Sources and disclosure basis

S1 Cardano Constitution, enacted current version (Article II §§6–7; Treasury guardrails)

<https://cardano.org/constitution/>

S2 DRepTalk, 2026–2027 Net Change Limit dashboard (checked 14 Oct 2026)

<https://dreptalk.com/treasury/2026-27>

S3 CME Group, physical copper contract delivery specifications and Grade 1 standard

<https://www.cmegroup.com/education/courses/introduction-to-base-metals/what-is-the-base-metals-delivery-process>

S4 CME Group, Henry Bath Westwego copper regularity (13 Jan 2026)

<https://www.cmegroup.com/notices/market-regulation/2026/01/mkr01-13-26.html>

S5 CME Group, New Orleans/Westwego storage/handling schedule (23 Feb 2026)

<https://www.cmegroup.com/notices/market-regulation/2026/02/mkr02-23-26.html>

S6 Deutsche Bank copper \$10/lb call, via Wall Street Journal, 28 Sep 2026

<https://www.wsj.com/livecoverage/stock-market-today-dow-sp-500-nasdaq-09-28-2026/card/copper-could-jump-50-to-hit-10-a-pound-deutsche-bank-predicts-aoBUfd0hWZhCtDOZtA6D>

S7 Investing.com, COMEX Dec 2026 copper historical quotes, 14 Oct 2026

<https://ca.investing.com/commodities/copper-historical-data>

S8 J.P. Morgan Global Research, metals outlook, 21 Aug 2026

<https://www.jpmorgan.com/insights/global-research/commodities/aluminum-steel-copper-prices>

S9 Goldman Sachs Research, record copper prices not forecast to last, 23 Jan 2026

<https://www.goldmansachs.com/insights/articles/why-record-high-copper-prices-arent-forecast-to-last>

S10 Goldman Sachs Research, medium/long-run copper outlook, 11 Dec 2025

<https://www.goldmansachs.com/insights/articles/copper-prices-forecast-to-decline-from-record-highs-in-2026>

S11 GovTool, Treasury Withdrawal action type

<https://docs.gov.tools/cardano-govtool/using-govtool/governance-actions/types-of-governance-actions/treasury-withdrawal/>

S12 GovTool, submission and deposit requirements

<https://docs.gov.tools/cardano-govtool/using-govtool/governance-actions/>

S13 CIP-108 governance metadata

<https://cips.cardano.org/cip/CIP-108>

S14 CIP-100 anchor hashing requirements

<https://github.com/cardano-foundation/CIPs/blob/master/CIP-0100/README.md>

S19 Cardano Foundation/Draper Dragon return-of-capital precedent, Jan 2026

<https://forum.cardano.org/t/scaling-global-adoption-cardano-and-draper-dragon-partner-for-strategic-80m-fund/152493>

S18 U.S. Bankruptcy Code, 11 U.S.C. §362 automatic stay

<https://www.law.cornell.edu/uscode/text/11/362>

S17 U.S. Uniform Commercial Code Article 9, security perfection by possession/delivery and filing

<https://www.law.cornell.edu/ucc/9/9-313>

S16 U.S. Uniform Commercial Code Article 7, warehouse delivery obligations and rights under documents of title

<https://www.law.cornell.edu/ucc/7/7-403>

S15 Cardano public Treasury Donation utility

<https://cardano.org/apps/treasury-donation/>

S20 Paxos, Pax Gold (PAXG) product information and physical gold reserves (comparator only)

<https://www.paxos.com/pax-gold>

S21 Tether, physical gold backing and attestation for XAU_T (comparator only)

<https://tether.io/news/tether-reports-xaut-grows-amid-shifting-monetary-landscape-releases-its-first-attestation-for-q1-2025-more-than-7-7-tons-of-physical-gold-backing-the-token-in-circulation/>

S22 Intersect MBO, April 2026 enacted Cardano x Draper Dragon Orion Fund proposal (return-of-capital precedent)

<https://intersectmbo.org/news/intersect-weekly-update-106-april-10-2026>

S23 PwC digital-asset assurance service description (not evidence of CuTT acceptance)

<https://www.pwc.com/us/en/services/digital-assets/assurance.html>

S24 Cardano Foundation, Reeve enterprise reporting announcement (8 Jul 2025)

<https://cardanofoundation.org/blog/unveiling-reeve-enterprise-reporting>

APPENDIX A / Exact GovTool submission procedure

This appendix describes the final-submission workflow for a Cardano Treasury Withdrawal naming Toto Finance Inc. as the on-chain recipient and accountable project administrator. The reward address stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax and A0 prior-24-month Treasury funding disclosure are included. PwC US independent oversight, warehouse/copper documentation, financial audits and bridge development are planned post-approval, pre-deployment milestones. Immutable hosting, metadata hash, live NCL check and a funded proposal-signing wallet are still required at the actual signing step.

1. Confirm Toto Finance recipient and proposed independent oversight

The on-chain recipient is Toto Finance Inc. at stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax. Its prior 24-month Cardano Treasury funding received is A0. Toto Finance is accountable for funds and project reporting. The 3% independent oversight allowance supports a future U.S. PwC member-firm appointment if accepted, or another qualified independent provider. Do not claim any third-party engagement already exists. Signed custody, legal, audit and security arrangements are implementation milestones required before the related fund deployments, not documents falsely claimed to exist today.

The technical plan is canonical Ethereum CuTT issuance, full Treasury-tranche ERC-20 escrow lock, audited supply-conserving Cardano bridge, and Cardano-only active bridged CuTT for the Treasury

tranche. Contract addresses, policy IDs, Cardano bridged-token custody wallet and independent audit results will be published when implemented and verified. The ordinary Toto payment address `addr1qxxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpdkj98pq37knemvdlcvmn3hc2uum20vu7zy7p0c36vfygs09fkl0` is not itself proof of a dedicated CuTT token-reserve account.

2. Verify current Cardano state

Check the NCL tracker, newly enacted and pending withdrawals, Constitution/guardrails, governance-action deposit, the current submission procedure and current voting requirements. Verify that $\text{A}22\text{M}$ still fits within the actual NCL headroom at submission, ratification and activation; today's tracker snapshot does not reserve headroom.

3. Confirm the Toto Finance mainnet reward account

The proposed Cardano mainnet Treasury Withdrawal recipient is `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. It corresponds to the Toto Finance-provided payment address `addr1qxxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpdkj98pq37knemvdlcvmn3hc2uum20vu7zy7p0c36vfygs09fkl0`. Recheck both addresses and signing authority with the Ledger-controlled wallet before submitting; an address string alone does not independently establish corporate control. Keep private keys and recovery phrases offline.

4. Prepare submitting wallet and deposit-return credential

Use a compatible proposal-signing wallet funded with the current refundable governance-action deposit (previously $\text{A}100,000$; recheck live protocol settings) plus transaction fees. The deposit-return reward credential must be confirmed in the actual signing flow. It may equal `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax` only if supported and deliberately selected. The deposit is separate from the requested $\text{A}22\text{M}$.

5. Complete metadata fields

Confirm GovTool title, abstract, motivation, rationale, references, reward address `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`, and the exact 22,000,000,000,000-lovelace amount. Use the companion JSON-LD and GovTool text, then verify byte-for-byte consistency of the hosted final metadata before signing.

6. Freeze immutable annexes and metadata

Publish the final signed proposal (e.g., PDF) and CIP-108 JSON-LD to immutable content-addressed hosting such as IPFS. Resolve each URL and retain CID/raw bytes. The on-chain anchor is the URL and BLAKE2b-256 hash of the exact bytes of the final JSON-LD metadata; compute using ``cardano-cli hash anchor-data --file-text ...`` or ``b2sum -l 256 ...``, and compare the fetched hosted bytes.

7. Open official GovTool

Go to <https://gov.tools> and connect a compatible Cardano MAINNET wallet. Open Governance Actions → Proposals; verify identity by signing a message; Create New Proposal → Treasury Withdrawal. (UI labels can change.)

8. Enter narrative and amount

Use the companion GovTool submission text. Choose Treasury Withdrawal and set exactly 22,000,000 ADA (22,000,000,000,000 lovelace). Enter the Toto Finance receiving reward address `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`. This is not the ordinary ADA payment address `addr1qxxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpdkj98pq37knemvdlcvmn3hc2uum20vu7zy7p0c36vfys09fkl0`. Confirm all fields and address checksum against the Ledger-controlled account.

9. Seek DRep consultation before submission

Share the final proposal with DReps and constitutional reviewers. Discuss the fact that Toto Finance itself controls the receiving wallet, the planned (not yet engaged) independent oversight provider, 33.07% total non-copper allocations, proposed pre-deployment controls, market/FX risks and enforceability of return commitments. Revise and re-anchor the metadata if feedback materially changes the proposal.

10. Submit actual action

After immutable publication, submit the governance action with its exact metadata URL/hash, ~~A~~22M amount, Toto Finance recipient `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax`, actual deposit-refund address and required deposit. Confirm the wallet can sign governance-action submission; do not assume Ledger hardware integration works for that specific transaction type. Record the transaction hash and action ID.

11. Verify transaction and monitor voting

Record transaction hash, Governance Action ID, exact metadata anchor and PDF/annex CID. Share these with DReps and CC. Track action voting, NCL availability, expiration and enactment; an editable Proposal discussion does not itself move treasury funds.

12. Execute and report only after enactment

After enactment, Toto Finance Inc. receives the ADA at `stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax` and remains accountable for segregation, procurement and reporting. Before copper deployment, it must establish the independent legal/custody/security protections described in the action and engage independent assurance. The proposed U.S. PwC member firm may be retained for independent professional oversight if it accepts; otherwise a suitably qualified independent provider may be used. The project must reconcile ADA/TOTO/USD invoices and all related-party fees, publish proof of copper backing and Ethereum/Cardano locked/bridged supply, pay ~~A~~2,640,000 technology/project-management compensation only against independently accepted milestones, and return all net sale proceeds and unused/unearned funds to Cardano Treasury by month 36.

Submission fields: strict format check

FIELD	REQUIRED VALUE / CHECK
Governance action	Treasury Withdrawal

FIELD	REQUIRED VALUE / CHECK
Request	₳22,000,000 = 22,000,000,000,000 lovelace Toto Finance Inc. Cardano mainnet reward address: stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax. This is the Treasury Withdrawal recipient. Toto Finance ADA payment address:
Funds-receiving address	addr1qxv96vew7da96d95r8n4ew7asq06hzjflq8wghyc6cw8lpdkj98pq37k nemvdllcvmn3hc2uum20vu7zy7p0c36vfys09fkl0. The two addresses have distinct roles; the bridged CuTT reserve custody address/policy ID will be defined after deployment.
Deposit-return reward address	The actual governance-action submitter must confirm the deposit-refund reward credential in its wallet. If Toto Finance submits from this same supported stake credential, stake1uxmfznssgltfuakxlluxdecmu9wwd48kw0pz0qhugaxyjyguc0tax may be selected; do not assume this without wallet verification.
Wallet funding	Current govActionDeposit (documented ₳100k) + transaction fees
Public metadata	Final CIP-108 JSON-LD, content-addressed URL, BLAKE2b-256 exact raw bytes
Full legal proposal	Final proposal PDF and CIP-108 JSON-LD published immutably before signing; copper contracts, auditor mandates and bridge/security results are funded post-approval pre-deployment milestones.
Named admin and auditor	Toto Finance Inc. is named accountable recipient/administrator. A U.S. PwC member firm is the preferred independent professional oversight provider, subject to engagement; another qualified independent provider may be appointed. Separate independent audit firms will be engaged before the relevant implementation stages.
Treasury previous 24 months	Toto Finance Inc. confirms ₳0 Cardano Treasury funding received in the prior 24 months. No PwC or Intersect funding history is claimed because neither is the on-chain recipient.