Article 8(4) Statement – Regulatory Classification of DavinCoin (DAVC)

Pursuant to Article 8(4) of Regulation (EU) 2023/1114 (MiCAR)
Issuer: CoreTech Software Solutions LLC
Token: DavinCoin (DAVC)
Date: 06 September 2025

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1 Purpose and Legal Basis

This document accompanies the DavinCoin crypto-asset white paper under **Article 8(1) MiCAR**. It explains, with reference to **Article 8(4) MiCAR**, why DAVC **should *not*** be regarded as:

- **(a)** a *financial instrument* under Article 4(1) point 15 of Directive 2014/65/EU (MiFID II);
- **(b)** an *electronic money token* (EMT) under Article 3(1) point 7 MiCAR;
- **(c)** an *asset-referenced token* (ART) under Article 3(1) point 6 MiCAR; or
- **(d)** a crypto-asset *excluded* from MiCAR under **Article 2(4)**.

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2 Legal Classification

2.1 MiFID II Analysis – *Not* a Financial Instrument (Art. 8 (4)(a))

The exhaustive MiFID II list (Annex I, Section C) is compared below:

MiFID II category	Essential legal features	DAVC assessment	Conclusion
Transferable securities	Negotiable; confer ownership, creditor or similar rights over an issuer and serve capital-raising purposes.	DAVC confers **no equity, debt, dividend or control rights** over CoreTech; issuance is **not for capital raising**.	Not applicable
Money-market instruments	Debt instruments ≤ 397 days, interest/redemption at par.	No maturity, coupon or redemption promise.	Not applicable
Units in collective investment undertakings	Rights in a pooled investment managed for investors' account.	No pooling of assets; no portfolio management.	Not applicable
Derivatives & other contracts	Value derived from underlying; settlement rights.	Value arises solely from market demand; no settlement or linkage to an	Not applicable

MiFID II category	Essential legal features	DAVC assessment	Conclusion
		underlying asset, index or event.	

Accordingly, DAVC **is not** a financial instrument under MiFID II.

2.2 Not an Electronic Money Token (Art. 8 (4)(b))

- No peg to any single official currency.
- No legal commitment by any party to redeem at par value.
- Token does **not** represent a claim on the issuer or a credit institution.

2.3 Not an Asset-Referenced Token (Art. 8 (4)(c))

- Not referenced to a basket of fiat currencies, commodities or crypto-assets.
- No reserve, collateral or redemption mechanism exists.
- Market price is determined exclusively by supply and demand on permissionless exchanges.

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3 Technical & Functional Summary

- **Standard:** BEP-20-compatible on BNB Chain (PoSA); contract: *0x…*.
- **Maximum supply:** 500 000 000 DAVC (hard-capped).
- **Utilities:** protocol-fee staking rebates, participation in an insurance pool, governance voting on smart-contract parameters, and discounted payment for affiliated services.
- **Governance:** on-chain voting **affects protocol logic only** and grants **no corporate rights** over CoreTech.

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4 Disclaimer

This statement does **not** constitute an offer of securities, a prospectus under Regulation (EU) 2017/1129, or financial advice. Regulatory treatment may evolve; purchasers should obtain independent legal, tax and technical advice.