EURC / CIRCLE

RESERVES • LIQUIDITY • REDEMPTION • MiCA • MULTICHAIN ARCHITECTURE

Transparency and Analysis Report — End-August 2026 Edition

1. Executive Summary

EURC is Circle's euro-denominated stablecoin. Launched on 30 June 2022 as Euro Coin / EUROC, it was renamed EURC in September 2023 without the creation of a new token. Since 1 July 2024, Circle Internet Financial Europe SAS ("Circle France") has been the sole issuer and redeemer of EURC. Monthly reports issued after this transition address an assertion by the management of Circle Internet Group, Inc.; the token issuer and the entity whose management makes the assurance assertion must therefore be distinguished.

The historical series covers 50 monthly reports and 93 observation dates between 30 June 2022 and 31 July 2026. At the latest date covered by the independent examination, 397,363,133 EURC were in circulation against €400,113,753 of reserve assets, representing a €2,750,620 surplus and a 100.692% coverage ratio. The published breakdown shows €400,053,404 of bank cash and +€60,349 of net timing and settlement differences.

EURC's architecture should not be equated with that of USDC. Recent EURC reports disclose euro-denominated reserves consisting of cash held with regulated financial institutions in segregated accounts, adjusted for timing and settlement differences. Circle's Form S-1/A also states that EURC reserves are held entirely in cash. No EURC Circle Reserve Fund, money market fund, Treasury bill portfolio, CUSIP portfolio or reverse repo is disclosed for EURC.

The main public blind spot now concerns bank counterparties and deployable liquidity rather than the asset class itself. Recent reports disclose neither the names nor the number of banks, the share of reserves entrusted to each institution, nor a same-day / next-business-day liquidity breakdown. As of 27 August 2026, Circle reported €395.9 million of EURC in circulation and approximately €398.6 million of reserves, implying point-in-time coverage of about 100.68%. This snapshot post-dates the latest Deloitte examination and therefore does not carry the same level of assurance.

Flows published as of 27 August also show significant redemption activity: €107.3 million over seven days and €375.7 million over thirty days. Over thirty days, gross redemptions represented approximately 94.9% of the €395.9 million amount in circulation. This observed processing capacity is a useful operational indicator, but it is not a stress test of a simultaneous redemption of a major share of outstanding EURC.

BANKING RISK — Breakdown by institution not disclosed; bank concentration cannot be measured directly from the public information available.

Sources: EURC monthly reports 2022–2026; Circle Transparency and EURC page, 27/08/2026; Circle Form S-1/A; EURC MiCA White Paper; audited annual accounts of Circle France.

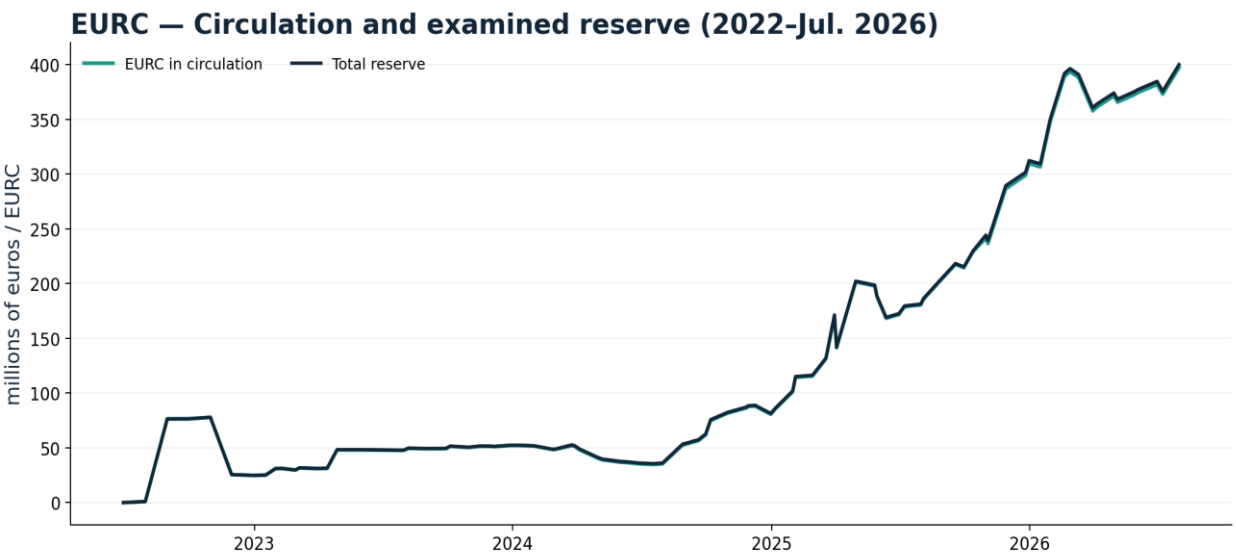


Figure 1 — EURC circulation and reserve assets over time

Source: Our calculations based on Circle's 50 monthly reports (93 observations).

2. Scope, Sources and Reading Conventions

Our analysis is based primarily on the monthly EUROC/EURC reports from June 2022 to July 2026, the EURC MiCA White Paper, the Redemption Policy, Circle Mint documentation, the audited 2024 and 2025 statutory accounts of Circle Internet Financial Europe SAS, Circle Internet Group, Inc.'s Form S-1/A, Q2 2026 results and official publications relating to supported networks. Where market or ecosystem data are used, they are distinguished from reserve data and, wherever possible, reconciled to a primary source.

Each published observation date is analysed separately, including where a single report contains two dates. Summary figures examined by the independent accountant are used as the reference for EURC in circulation and the fair value of reserve assets; the detailed tables explain the relationship between bank cash and timing/settlement differences. Our calculations — coverage, surplus, changes and ratios — are identified as such.

The monthly reports are "examination reports" performed under AICPA attestation standards and designed to provide reasonable assurance on the assertion defined in each report. They are not audits of the reserves in the sense of a financial-statement audit. Circle France's annual accounts, by contrast, are subject to a separate statutory audit.

3. History of EURC

Circle announced Euro Coin on 16 June 2022 for an official launch on Ethereum on 30 June 2022. The first reserve report recorded only 2,186 EUROC in circulation at that date. On 22 September 2023, Circle adopted the EURC name and symbol; existing token addresses remained unchanged and no new token was created.

Multichain expansion then proceeded in stages: Avalanche in May 2023, Stellar in September 2023, Solana in December 2023, Base in July 2024, World Chain in December 2025, Cronos in June 2026 and Plasma on 28 August 2026. Examination reports may list a network among the “Approved Blockchains” before its public launch date; this is visible for Avalanche, Stellar, Solana and Base and supports a clear distinction between documentary classification and public operational status.

Date	Event	Scope
30/06/2022	Launch of Euro Coin / EUROC on Ethereum	Start of the reserve-report series.
25/05/2023	Avalanche	First multichain expansion.
22/09/2023	EUROC becomes EURC	Renaming, with no new token.
26/09/2023	Stellar	Third native chain.
18/12/2023	Solana	Fourth native chain.
01/07/2024	Circle France becomes the sole EURC issuer	MiCA transition / European issuer.
30/07/2024	Base	Fifth native chain.
11/12/2025	World Chain	2025 expansion.
29/06/2026	Cronos	2026 expansion.
28/08/2026	Plasma	Event occurring after the latest examined monthly report.

Source: Circle official launch announcements; EURC monthly reports; EURC MiCA White Paper.

4. Legal Architecture and Circle Entities

Until 30 June 2024, the monthly reports identify Circle Internet Financial, LLC as both the company making the assertion and the issuer of EURC. From 1 July 2024, the White Paper and the French statutory accounts establish that Circle Internet Financial Europe SAS became the sole issuer and redeemer of EURC worldwide. Circle LLC retained, among other functions, an intragroup service-provider and distribution role for certain customers outside the EEA.

From the July 2024 reports onwards, the examined management assertion is made by Circle Internet Group, Inc., while EURC is stated to be issued and redeemed by Circle Internet Financial Europe SAS. This distinction should be maintained in any assurance or legal-liability analysis.

Form S-1/A also describes the 1 July 2024 reorganisation under which Circle Internet Group, Inc., a Delaware corporation, became the parent company of the group following an Irish scheme of arrangement. That reorganisation was not, in itself, a change in the token issuer; the EURC issuer transition resulted from Circle France becoming operational.

Entity	Relevant EURC role	Period / observation
Circle Internet Financial, LLC	Issuer / redeemer before the transition; intragroup services/distribution thereafter	2022 – 30/06/2024, then group role
Circle Internet Financial Europe SAS	Sole global issuer and redeemer of EURC	Since 01/07/2024
Circle Internet Group, Inc.	Entity whose management makes the monthly assertion after the transition; ultimate parent company	Since the July 2024 reports
Circle Internet Financial Limited	Immediate parent / related company in the Circle France chain of control	Group structure

Source: [WP] EURC MiCA White Paper; [AF2025] 2025 annual accounts; [S1] Form S-1/A; EURC monthly reports.

5. History of the Examination Reports

The corpus contains 50 monthly reports with no gaps between June 2022 and July 2026. Grant Thornton LLP signed the seven 2022 reports. Deloitte & Touche LLP took over from January 2023. The Deloitte reports examine the assertion that the fair value of assets held in the EURC Reserve is equal to or greater than EURC in circulation, applying AICPA attestation standards and seeking reasonable assurance.

The first report, dated 30 June 2022, is different: it states that the total fair value of euro-denominated assets in segregated accounts was "at least equal" to the 2,186 EUROC in circulation. We therefore treat the reserve at that date as a lower bound, not as an exact cash amount.

Period	Independent accountant	Nature	Observations
06/2022 – 12/2022	Grant Thornton LLP	Examination / AICPA attestation	7 reports; 1 observation date per month.
01/2023 – 07/2026	Deloitte & Touche LLP	Independent Accountants' Report / AICPA attestation	43 reports; generally 2 observation dates per report.
2024–2025 statutory accounts	Deloitte & Associés / ACA Nexia	Statutory audit of annual accounts	Work distinct from the monthly reserve examinations.

Source: Uploaded monthly reports; 2024 and 2025 statutory accounts of Circle Internet Financial Europe SAS.

6. EURC in Circulation

EURC in circulation rose from 2,186 at launch to 24,905,662 at end-2022, 52,199,724 at end-December 2023, 80,705,696 at end-2024 and 309,608,590 at end-2025. Between end-2024 and end-2025, the increase was approximately 283.6%, or +228,902,894 EURC.

As of 31 July 2026, examined circulation reached 397,363,133 EURC, up 28.3% since 31 December 2025 and 4.0% versus 30 June 2026. July was nevertheless non-linear: circulation fell by 8,920,516 EURC between 30 June and 8 July, then increased by 24,296,870 EURC between 8 and 31 July.

On 17 August 2026, Circle announced that EURC had exceeded €400 million in circulation. Circle’s product page subsequently showed 395.9 million EURC in circulation as of 27 August 2026. The 27 August figure is a current issuer data point and is not an observation covered by Deloitte’s July monthly report.

Source: Circle monthly reports; Circle, “EURC Surpasses €400 Million in Circulation”; EURC page, snapshot as of 27/08/2026.

7. Reserve Composition

The observed reserve architecture is cash-based. Circle's Form S-1/A explicitly states that all EURC reserves were then held solely in cash. Recent monthly reports define the fair value of reserve assets as the total balance of euro-denominated assets held in segregated accounts with regulated financial institutions on behalf of EURC holders.

In the detailed presentation, total reserve assets are derived from bank cash, adjusted for amounts due to / owed by Circle because of timing and settlement differences. These differences may be positive or negative and notably reflect deposits or withdrawals occurring after the bank cut-off but before the observation date.

READING THE RESERVE — Recent EURC reports disclose bank cash and timing/settlement differences. No EURC category of Circle Reserve Fund, BlackRock money market fund, Treasury bills, CUSIPs or reverse repos is disclosed. Those instruments belong to the USDC architecture and should not be transposed to EURC.

Source: [S1] Form S-1/A; [R2022-06 to R2026-07] EURC monthly reports.

8. Coverage of EURC in Circulation

Across the 92 observations for which an exact reserve amount is published, the average reserve-to-circulation ratio is 100.722%. The maximum is 102.154% on 18/07/2024. The first exact observations in 2022 are at 100.000%. The first observation, on 30 June 2022, is classified as "≥100%" because the report discloses only a lower bound.

The reserve surplus is not constant over time. It becomes structurally positive in the 2023–2026 series, notably as margins above circulation are built up. As of 31 July 2026, the surplus was €2,750,620.

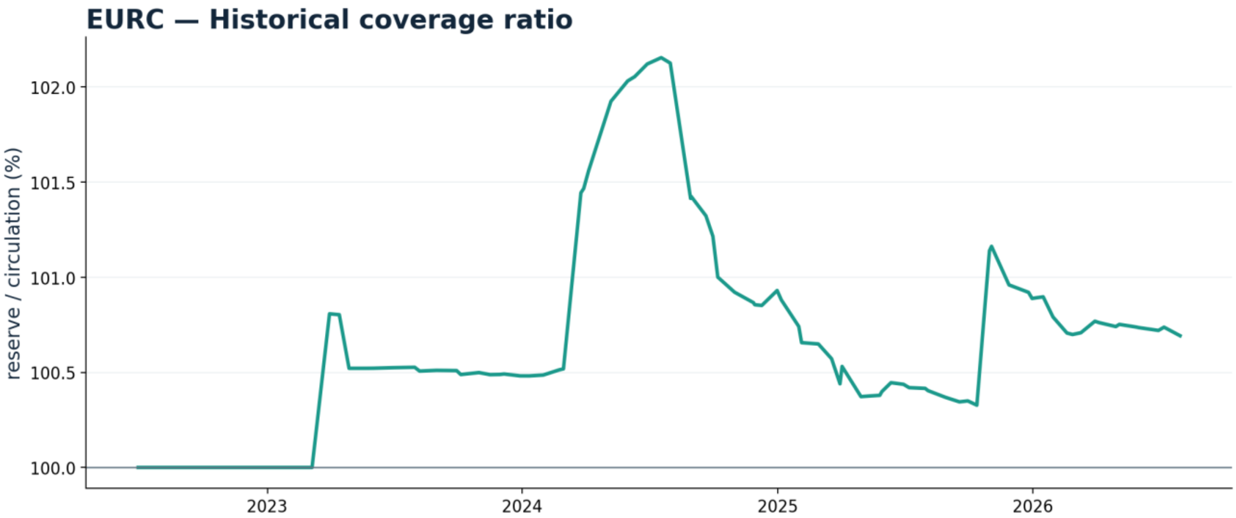


Figure 2 — Historical coverage ratio

Source: Our calculations based on Circle monthly reports. June 2022: lower bound.

Date	Circulation	Reserve	Surplus	Coverage
30/06/2026	381 986 779	€384,737,359	€2,750,580	100.720%
08/07/2026	373 066 263	€375,816,843	€2,750,580	100.737%
31/07/2026	397 363 133	€400,113,753	€2,750,620	100.692%

Source: EURC reports for June and July 2026; our calculations.

9. Bank Cash, Counterparties and Banking Risk

The identity of the banks was documented more extensively at the beginning of the series. Silvergate Bank is named from July to September 2022. Bank of New York Mellon appears alongside Silvergate from October 2022 through 6 March 2023. At 31 March and in April 2023, the report names Bank of New York Mellon; in May 2023, 100% and then more than 79% of cash is reported at BNY Mellon, with other regulated institutions used for issuance and redemption; in June, July and August 2023, BNY Mellon continued to be reported as holding more than 79% / 80% of cash.

From the September 2023 reports onwards, the bank-by-bank breakdown is no longer disclosed in the monthly table. The regulated status of the institutions does not allow their identity, number, rating, diversification or any public guarantee to be inferred. Banking counterparty risk therefore remains even where the reserve is entirely held in cash.

Recent public information does not allow concentration by bank or jurisdiction to be determined. In particular, the following are not disclosed: balances by institution, the number of reserve banks, the share held at sight or at term, counterparty limits, transfer capacity between banks, or the expected operational treatment in a bank-resolution scenario. The reference to “regulated financial institutions” is a prudential filter; it is neither a credit rating nor evidence of diversification.

COUNTERPARTY TRANSPARENCY — Breakdown by institution not disclosed; bank concentration cannot be measured directly from the public information available. Names, countries, percentages, sight/term arrangements and transfer capacity between banks are not disclosed for the recent EURC reserve.

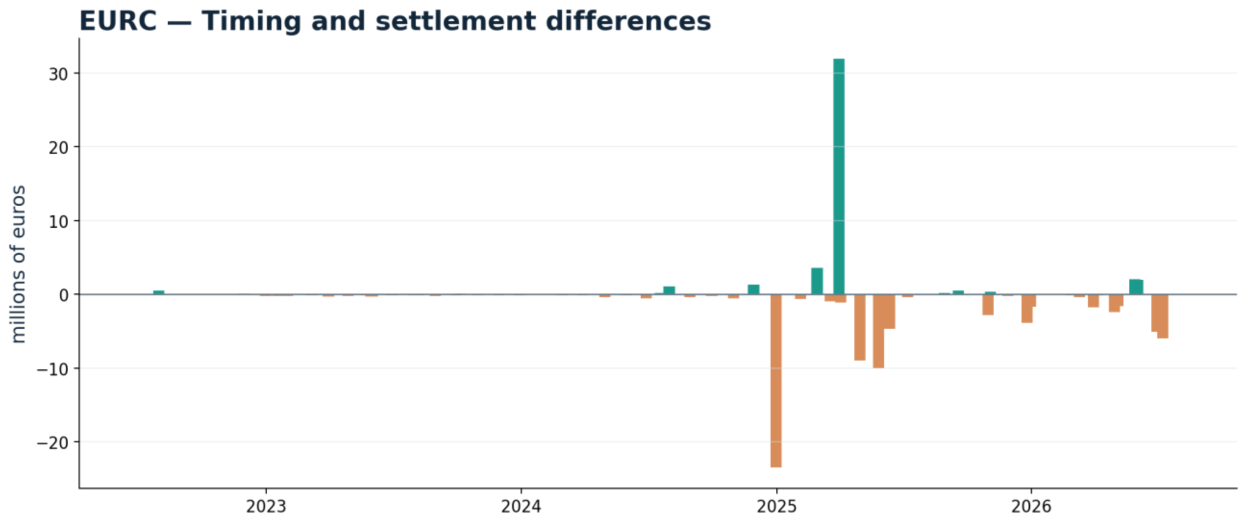
Circle France’s 2025 statutory accounts report €4.108 billion of reserve and settlement accounts as of 31 December 2025, compared with €1.293 billion at end-2024. These amounts are aggregated across Circle France’s customer activities and do not constitute a bank-by-bank breakdown specific to EURC.

Source: Monthly reports 2022–2023; Circle France 2025 statutory accounts.

10. Timing and Settlement

Timing/settlement differences are a normal but at times significant component of the published reserve. The series' negative extreme is -€23,469,467 as of 31/12/2024; the positive extreme is +€31,904,749 as of 31/03/2025. These amounts should not be treated as losses: they adjust cash to align the bank observation with issuance/redemption transactions at the cut-off.

Two documentary inconsistencies remain visible. As of 31 October 2023, the examined summary reports €50,636,368 while the detailed cash + timing breakdown and detailed total give €50,636,369, a €1 difference. As of 11 January 2024, cash of €52,438,542 and the €3 timing amount shown in parentheses would, under the usual sign convention, produce €52,438,539, while the published total is €52,438,545, a €6 difference. We retain these anomalies as they appear in the source documents and do not attribute an undocumented cause to them.



A cross-check against Circle France's audited annual accounts identifies two small differences in circulation: €80,705,694 in the accounts as of 31 December 2024 versus 80,705,696 EURC in the December 2024 monthly examination report, a -€2 difference; and €309,608,564 in the accounts as of 31 December 2025 versus 309,608,590 EURC in the December 2025 monthly examination report, a -€26 difference. The documents reviewed do not explain these differences. We present them as unexplained inter-document differences and do not infer an accounting, operational or on-chain cause.

Figure 3 — Timing / settlement differences

Source: Circle monthly reports; signed amounts follow the presentation used in the reports.

Source: EURC reports for October 2023 and January 2024; BECTRA reconciliation calculations.

11. Reserve Liquidity, Redemption Capacity and Secondary Market

The reserve exhibits high liquidity given the nature of the published assets: euro-denominated bank cash, adjusted for timing and settlement differences. This structure reduces the duration and valuation risk associated with a bond portfolio, which is not disclosed for EURC. It does not, however, eliminate depositary-bank risk, access-to-account risk, settlement constraints or compliance constraints.

Operational liquidity depends on bank accounts, the availability of euro/SEPA payment rails, cut-offs, business days, and KYC/KYT and sanctions controls. The Redemption Policy updated on 13 July 2026 provides that certain direct redemptions by holders who are not Circle Mint customers are generally processed within no more than five business days after receipt of the tokens and completion of the checks, absent an anomaly or discrepancy. This timeframe should not be interpreted as a universal same-day or next-business-day commitment.

Secondary-market liquidity is a third dimension. It depends on venues, pools, market makers, spreads and distribution across blockchains. It should not be confused with reserve liquidity or with the legal right to redemption at nominal value.

Flows published by Circle as of 27 August 2026 provide a useful indication of observed operational throughput:

Horizon	Issuance	Redemptions	Published net change
7 days	€100.0m	€107.3m	-€7.2m
30 days	€376.4m	€375.7m	+€0.7m
365 days	€3,006.3m	€2,813.5m	+€192.7m

Reading: over thirty days, gross redemptions of €375.7 million represented approximately 94.9% of the €395.9 million in circulation observed on 27 August. This ratio indicates high redemption activity over the period; it does not measure the capacity to absorb a simultaneous run of 50%, 75% or 100% of EURC in circulation.

Sources: Circle MiCA Redemption Policy, 13/07/2026; Circle Transparency, snapshot 27/08/2026; EURC monthly reports; our calculation of the redemption-to-circulation ratio.

12. Multichain Architecture

As of 30 August 2026, eight networks had a verified native public launch: Ethereum, Avalanche C-Chain, Stellar, Solana, Base, World Chain, Cronos and Plasma. Arc appears in the July 2026 report criteria as an “Approved Blockchain”, but Circle’s Q2 2026 results still announced public mainnet for 16 September 2026. We therefore treat it separately as approved for reporting purposes but not yet publicly launched at the cut-off date.

Circle documentation is not perfectly synchronised: the EURC contract-address page reviewed lists Avalanche, Base, Ethereum, Solana, Stellar and World Chain but does not yet incorporate the very recent Cronos and Plasma launches, although the official launch announcements publish their addresses. This documentation lag is a useful control point in procedures for onboarding new networks.

Network	Public launch	Official address / identifier
Ethereum	30/06/2022	0x1aBaEA1f7C830bD89Acc67eC4af516284b1bC33c
Avalanche C-Chain	25/05/2023	0xC891EB4cbdEFf6e073e859e987815Ed1505c2ACD
Stellar	26/09/2023	EURC-GDHU6WRG4IEQXM5NZ4BMPKOXHW76MZM4Y2IEMFDVXBSDP6SJY4ITNPP2
Solana	18/12/2023	HzwqbKZw8HxMN6bF2yFZNrht3c2iXXzpKcFu7uBEDKtr
Base	30/07/2024	0x60a3E35Cc302bFA44Cb288Bc5a4F316Fdb1adb42
World Chain	11/12/2025	0x1C60ba0A0eD1019e8Eb035E6daF4155A5cE2380B
Cronos	29/06/2026	0xA6dE01a2d62C6B5f3525d768f34d276652C554c8
Plasma	28/08/2026	0x3ee196e78d4d4248b849b8e1c7f44c5457fafd2c
Arc	Public mainnet announced for 16/09/2026	Mainnet: data not available at the cut-off

Source: Circle Developer Docs; Circle announcements for Avalanche, Stellar, Solana, Base, World Chain, Cronos and Plasma; July 2026 EURC report; Circle Q2 2026.

13. On-chain Reconciliation

The official definition of EURC in circulation used in the report is Circle's: total supply on the Approved Blockchains, less Tokens Allowed But Not Issued, less Access Denied Tokens. This definition reconciles to zero across all 93 observations in the database, using published figures or, for the 2022 phase, an arithmetic reconstruction where both deductions are explicitly zero.

Tokens Allowed But Not Issued become significant with the Solana architecture and reach 59,406,473 tokens as of 31 July 2026. Access Denied Tokens are zero across all 93 observations in the corpus. The historical absence of "access denied" tokens in the reports does not mean that the freezing or blocking mechanism does not exist: Circle's legal documents expressly provide for this power where required by law, sanctions or a competent authority.

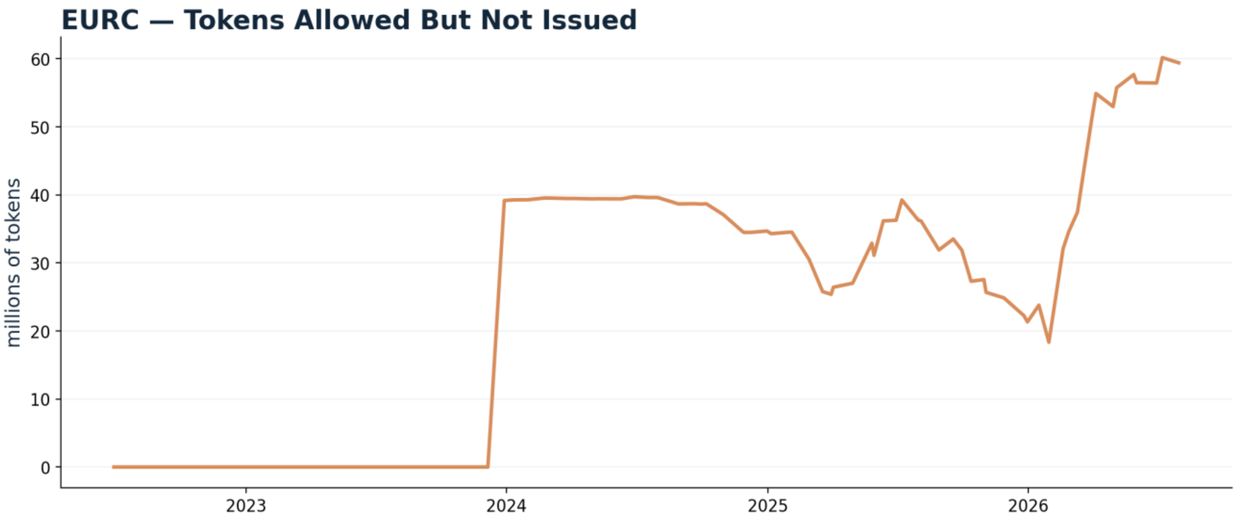


Figure 4 — Tokens Allowed But Not Issued

Source: Circle monthly reports; historical series.

Circle does not publish, in the Reserve Reports, a complete historical breakdown of circulation by blockchain. Official contracts identify native representations, but supply by chain at each date would require a separate reconstruction using blockchain explorers. We therefore do not use a network-by-network breakdown as official data where Circle does not publish it.

Source: EURC monthly reports; Circle Stablecoin Access Denial / White Paper; Circle Developer Docs.

14. Redemption Rights

MiCA and Circle's policy distinguish the legal right to redemption from the operational redemption journey. Circle France is the issuer of EURC and the right to redemption at nominal value applies subject to the controls required by the policy and applicable regulation. Circle Mint remains an institutional service; a holder who is not a Circle Mint customer may follow a direct redemption process when the conditions are met, or sell EURC on the secondary market. None of these channels should be presented as universal and instantaneous redemption.

Holder profile	Route	Key conditions	Timing / value
Circle France / Circle Mint customer	Circle Mint account	Contractual terms + compliance	At nominal value; mechanics subject to account terms
Holder who is not a Circle Mint customer	Circle Mint "redemption only" account	KYC/KYT and eligibility	At nominal value
Retail holder	Dedicated Circle France form	KYC/KYT; EEA IBAN; SEPA-compatible account; unique deposit address	Target payment ≤ 5 business days after receipt/checks, absent discrepancies
Holder via exchange/CASP	Secondary market or direct request to Circle subject to eligibility	Platform rules or Circle policy	Secondary-market price not guaranteed at EUR 1

The Circle Mint fee structure amended with effect from 15 March 2026 should be analysed separately from the MiCA redemption right. Fees and credits associated with Circle Mint flows belong to the operational/contractual relationship; they do not turn the secondary-market price into a parity guarantee.

In a stress scenario, Recovery / Redemption Plans may temporarily alter operational sequencing. Maintaining the right to nominal value therefore does not mean that banking rails and processing will remain identical in all circumstances.

Source: Circle MiCA Redemption Policy, updated 13/07/2026; EURC MiCA White Paper; USDC/EURC redemption structure, effective 15/03/2026.

15. MiCA and Regulatory Status

EURC is classified as an e-money token (EMT) under MiCA. Circle France began issuing EURC on 1 July 2024 after obtaining its electronic money institution authorisation in France. Circle's licences page, updated on 27 August 2026, states EMI authorisation No. 17788.

A documentary discrepancy exists regarding the crypto-asset service provider authorisation number: Circle displays E2026-005 on its licences page and in its Redemption Policy, while the AMF's official whitelist shows N2026-005, with an authorisation date of 23 April 2026. We use the identifier published by the competent authority — N2026-005 — while documenting the discrepancy rather than silently correcting it.

MiCA notably establishes redemption of EMTs at nominal value and regulates the protection of funds received. The general requirements applicable to EMTs must, however, be distinguished from the detailed "reserve of assets" rules specific to ARTs. Segregation and safeguarding are important protections; on their own, they do not demonstrate the absence of banking risk, immediate access to funds, or direct ownership by each holder of a specific bank account.

Source: Circle EURC MiCA White Paper; Circle Licences (27/08/2026); AMF whitelist (23/04/2026); Regulation (EU) 2023/1114.

16. Depeg and Secondary Market

Reserve reports are not market-price reports. No systemic EURC depeg episode attributed by a primary source to a reserve shortfall was identified in the corpus. Market aggregators display historical extremes that may reflect very illiquid markets, specific trading pairs or data anomalies; these are not treated as evidence of reserve failure without corroboration from venue-level data.

Depeg analysis should therefore separate four possible causes: reserve insufficiency or doubt about reserves, primary-redemption friction, venue/pool illiquidity, and a local secondary-market shock. At end-August 2026, Circle's page showed 395.9 million EURC in circulation as of 27 August; this figure alone does not provide information on spreads in each market.

LIMITATION — Status of the historical depeg series: exact amplitudes have not been verified with sufficient robustness at venue level; no solvency conclusion is drawn from aggregators alone.

Source: Circle reserve reports; secondary-market data reviewed solely as a cross-check.

17. Recent Developments — End-August 2026

Date	Development	Classification
29/06/2026	Native EURC and CCTP available on Cronos	Network development; included in the June/July examination report.
01/07/2026	Circle extends Stablecoin Payouts to Circle Mint France	Operational / payments development.
13/07/2026	MiCA Redemption Policy updated	Legal / operational development.
05/08/2026	Circle Q2 2026 results; Arc public mainnet announced for 16/09/2026	Group / infrastructure development.
17/08/2026	Circle announces EURC > €400m in circulation	Commercial / adoption milestone; not treated as a reserve examination.
27/08/2026	Circle Transparency: €395.9m in circulation and approximately €398.6m in reserves.	Current snapshot after the latest examination report.
28/08/2026	Native EURC launched on Plasma	Network development after the latest monthly report.

These events do not change the latest independent assurance point: it remains 31 July 2026, in the Deloitte report signed on 27 August 2026.

Source: Circle Transparency; Circle EURC page; Circle Q2 2026 results; Circle Cronos / Plasma blog posts; MiCA Redemption Policy.

18. Risk Analysis

Risk	Assessment	Rationale / limitation
Reserve	Low to moderate	Bank cash disclosed; coverage > 1:1 in the observations. The main risk shifts to banks, account access and settlement.
Banking risk / concentration	Not publicly measurable	Names, countries, number of banks and percentages are not disclosed in recent reports; concentration by institution cannot be calculated.
Operational liquidity	Moderate	Dependence on banks, SEPA/rails, cut-offs, business days and compliance controls. Observed flows are significant but do not constitute a stress test.
Timing / settlement	Moderate	Adjustments can be significant, with extremes of several tens of millions of euros, without being equivalent to losses.
Legal / insolvency	Moderate	Safeguarding and segregated accounts are disclosed; depositary-bank, resolution, account-title and operational-availability risks remain.
Redemption	Moderate	Right to redemption at par, but execution is subject to KYC/KYT/sanctions controls, banking rails and stress procedures.
MiCA / compliance	Low to moderate	EMI issuer in France and MiCA EMT framework; strong regulatory requirements do not replace operational analysis of reserves.
Sanctions / freezing	Moderate	Blocking powers are provided for in Circle documents. Access Denied Tokens = 0 in the published series, which does not mean the mechanism is absent.
Multichain / smart contract	Moderate to high depending on use	Expanded technical surface; risk depends on the networks, contracts, bridges, wrappers and third-party protocols used.
Secondary market / depeg	Moderate	Price and depth vary by venue and blockchain; a secondary-market discount does not prove a reserve shortfall.
Transparency	Moderate	High reporting frequency, but bank-level granularity, same-day / next-business-day liquidity and EURC stress tests are not published.
Dependence on Circle	Moderate	Issuance, redemption, compliance and technical orchestration rely heavily on the Circle ecosystem and its intragroup arrangements.
Euro systemic risk	Currently low	Amount in circulation below €0.4bn as of 27 August 2026; contagion risk is currently more operational and confidence-driven than macro-financial.

Sources: EURC monthly reports; EURC MiCA White Paper; Redemption Policy; audited accounts; SEC Form S-1/A; Circle network documentation; Circle Transparency, 27/08/2026.

19. Euro-Stablecoin Benchmark

The benchmark is intentionally secondary and limited to comparable primary-source information. At end-August 2026, Circle reported 395.9 million EURC in circulation as of 27 August. Société Générale-FORGE reported 156.646 million EUR CoinVertible in circulation as of 30 August 2026, backed 100% by cash at Société Générale according to its transparency page. Quantoz reported 4.463 million EURQ as of 30 June 2026, with a 100.66% reserve ratio and a stated allocation of 34% cash / 66% government bonds. Banking Circle describes EURI as a MiCA EMT backed by segregated funds held in cash or cash equivalents.

Token	Issuer	Verified size point	Reserve / transparency	Observation
EURC	Circle Internet Financial Europe SAS	395.9m EURC — 27/08/2026	Monthly examination report; bank cash + timing	Primary subject of this report.
EURCV / CoinVertible	Société Générale-FORGE	156.646m — 30/08/2026	100% cash stated; daily transparency	French bank-issued institutional comparator.
EURQ	Quantoz Payments B.V.	4.463m — 30/06/2026	100.66%; 34% cash / 66% government bonds	Reserve structure differs from EURC.
EURI	Banking Circle S.A.	Comparable primary-source circulation figure not verified here	Cash or cash equivalents in a segregated structure	Bank-issued MiCA comparator.

The dates, definitions of “circulation” and transparency frequencies are not homogeneous. No overall risk ranking is inferred from these figures alone.

Source: Circle EURC page (27/08/2026); SG-FORGE CoinVertible (30/08/2026); Quantoz Transparency (30/06/2026); Banking Circle EURI.

20. Conclusion

The 2022–2026 series shows a particularly simple EURC reserve architecture: euro-denominated cash held with regulated financial institutions, adjusted for timing and settlement differences. As of 31 July 2026, the latest date covered by the independent examination, reserves exceeded circulation by €2.751 million. On 27 August, the current snapshot published by Circle also remained above 1:1. No instance of under-collateralisation appears in the published figures reviewed.

The principal transparency limitation concerns bank counterparties. Names and certain concentration levels were partially disclosed early in the historical series; they are no longer published in recent reports. Based on the public information available, it is therefore not possible to measure concentration by bank, geographic diversification, the share deployable on a same-day / next-business-day basis, or resilience under a bank-resolution scenario.

From a legal perspective, the 1 July 2024 transition is central: Circle France is the global issuer of EURC and the token falls under the MiCA EMT regime. Redemption at nominal value is established by the regulatory framework and Circle policy, but execution remains subject to compliance controls, banks and operational redemption-management arrangements.

Recent flows also show that EURC has become an operationally active instrument: gross thirty-day redemptions reached €375.7 million as of 27 August, approximately 94.9% of the amount in circulation on that date. This turnover is a positive indicator of normal operations but does not establish the capacity to process a simultaneous run. Multichain expansion increases EURC's utility while also increasing fragmentation risk, wrong-network risk and exposure to third-party infrastructure.

21. Sources and Limitations

Main primary sources:

ID	Source	Link / reference
[R]	Circle — EURC / EUROC monthly examination reports, June 2022 to July 2026	https://www.circle.com/transparency
[WP]	Circle Internet Financial Europe SAS — MiCA EURC White Paper	https://www.circle.com/legal/mica-eurc-whitepaper
[RP]	Circle France — MiCA Redemption Policy, updated 13 July 2026	https://www.circle.com/legal/mica-redemption-policy
[LIC]	Circle — Regulatory licenses, updated 27 August 2026	https://www.circle.com/legal/licenses
[AMF]	AMF — CIRCLE INTERNET FINANCIAL EUROPE SAS, whitelist	https://www.amf-france.org/fr/espace-epargnants/proteger-son-epargne/listes-blanches/psanpsca/circle-internet-financial-europe-sas-0
[DEV]	Circle Developers — EURC contract addresses	https://developers.circle.com/stablecoins/eurc-contract-addresses
[S1]	Circle Internet Group, Inc. — Form S-1/A, filed 27 May 2025	https://www.sec.gov/Archives/edgar/data/1876042/000119312525126208/d737521ds1a.htm
[AF2024]	Circle Internet Financial Europe SAS — 2024 statutory accounts	Official financial document
[AF2025]	Circle Internet Financial Europe SAS — 2025 statutory accounts	Official financial document
[CRONOS]	Circle — EURC on Cronos, 29 June 2026	https://www.circle.com/blog/now-available-usdc-eurc-and-cctp-on-cronos
[PLASMA]	Circle — EURC on Plasma, 28 August 2026	https://www.circle.com/fr/blog/now-available-usdc-eurc-cctp-and-bridge-kit-on-plasma
[MICA]	Regulation (EU) 2023/1114 — Markets in Crypto-Assets	https://eur-lex.europa.eu/eli/reg/2023/1114/oj
[TR27]	Circle — Transparency & stability, snapshot 27 August 2026	https://www.circle.com/transparency
[EURC]	Circle — EURC product page, snapshot 27 August 2026	https://www.circle.com/eurc
[Q2-26]	Circle Internet Group — Q2 2026 results / shareholder materials	https://investor.circle.com/financials/quarterly-results

Limitations: (i) no current bank-by-bank breakdown is published in the monthly reports; (ii) immediate same-day / next-business-day availability and EURC-specific stress tests are not published; (iii) the reserve reports do not provide a complete historical breakdown of circulation by blockchain; (iv) Circle's 27 August 2026 snapshot is not covered by the July examination report; (v) historical secondary-market price data are not sufficiently homogeneous to classify certain aggregator extremes as verified depegs; and (vi) some Circle documents show discrepancies or update lags, notably for certain regulatory identifiers or network lists. Where information is not published, that absence means neither non-existence nor non-compliance.