

# EU AI Act

Compliance assessment — 2024/1689

## Server: Token Holder Analysis — Distribution & Whale Detection

Slug: token-holder-analysis-distribution-whale-detection

Scan id: 63515fdd-a089-4aec-a7b6-0299785d2754

Assessed at: 2026-05-11 10:05:43 UTC

Sentinel version: 0.4.0

Rules version: 2026-04-23

**! Partially  
compliant**

**DRAFT for review — not legal advice. See attestation block for verification instructions.**

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### 1. Executive summary

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Assessment of Token Holder Analysis — Distribution & Whale Detection against EU AI Act: overall status partially compliant. Of 5 controls, 4 met, 0 unmet, 1 partial, 0 not applicable. 5 control(s) fell within MCP Sentinel's current assessor coverage; remaining control(s) are documented as not\_applicable until Phase 6 expands coverage. No control is unmet, but partial findings indicate residual risk below the mandatory threshold. All claims are traceable to individual finding rows via finding\_id and to the governing rule via rule\_id; the enclosing signed envelope commits MCP Sentinel to the exact bytes of this report.

### 2. Coverage & transparency

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Coverage band: low

Coverage ratio: 40%

Rules version: 2026-04-23

Analysis techniques applied:

- ast-taint
- capability-graph
- entropy
- linguistic-scoring
- schema-inference

### 3. Controls summary

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ControlName

Status

Evidence

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Art.9Risk

Management

System' Me@

Art.12Record-

Keeping' Me@

Art.13

Transparency

& Provision of Information to Deployers' Met 0

Art.14 Human Oversight' Met 0

Art.15 Accuracy, Robustness, and Cybersecurity! Partial1

## 4. Control details

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### Art.9 — Risk Management System

22 assessor rule(s) evaluated this control; no findings observed.

' Met

### Art.12 — Record-Keeping

5 assessor rule(s) evaluated this control; no findings observed.

' Met

### Art.13 — Transparency & Provision of Information to Deployers

14 assessor rule(s) evaluated this control; no findings observed.

' Met

### Art.14 — Human Oversight

13 assessor rule(s) evaluated this control; no findings observed.

' Met

### Art.15 — Accuracy, Robustness, and Cybersecurity

111 assessor rule(s) evaluated this control; 1 finding(s) observed (1 medium); all findings are below the high threshold (status: partial).

! Partial

#### Evidence:

[Medium] E1  
(finding 6661e76  
6-7f7c-41ee-845  
2-f1f0ff813e4d,  
confidence 75%)

SOURCE: environment at capability:tools — An MCP server that answers tool enumeration without authentication trusts the network. Under modern threat models (CCS 2007 DNS rebinding, open cloud networki

#### Required mitigations:

- Require authentication for all MCP server connections. For remote MCP servers adopt OAuth 2.0 per RFC 9700 / the MCP Authorization specification. For stdio-launched servers rely on the parent process's security boundary and DO NOT expose the same server over network transports. Even localhost-bound servers should require auth: DNS rebinding (CCS 2007) makes localhost reachable from any browser tab.

## 5. Multi-step attack chains

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No multi-step attack chains were synthesized for this server.

## 6. Cryptographic attestation

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**Algorithm:** HMAC-  
SHA256

**Key ID:** mcp-sentinel-  
dev

**Signer:** mcp-sentinel/  
v1

**Signed at:** 2026-05-14  
T09:14:40.655Z

**Canonicalization:**  
RFC8785

**HMAC-SHA256 signature (base64, wrapped at 64 chars):**

cU2QXafXxeXAimZTMmC4A+r66rczAOQQ5TMb4HCozf4=

**Verification instructions:**

To verify this report:

1. Extract the report body (everything except the .attestation field).
2. Canonicalize the body via RFC 8785 (JCS).
3. Compute HMAC-SHA256 with the signing key for key\_id "mcp-sentinel-dev".
4. Base64-encode the result and compare with the signature above.

