

The Authority will begin processing a Virtual Asset Service Provider (VASP) licensing application **only upon receipt of** <u>all</u> **required documents** as outlined in the Virtual Asset (Service Providers) (Amendment) Regulations, 2025.

This checklist below applies only to new Applicants (who do not currently hold a VASP Registration). It provides a comprehensive list of the required documents. Should a requested document be included as a section of another document, please indicate where it can be found.

- Applicants for VASP **licensing must provide a response for all items** listed and provide all documents as relevant in the application package.
- Applicants for a VASP waiver must provide a response for the relevant items listed in only Part A, Part D and Part E and any other information to support their application, as necessary.
- Documents should be numbered in accordance with the checklist's numbering system (Item
 #) as far as possible e.g.#6. Business Plan.

The Authority <u>will not</u> initiate the application review until all documents have been submitted and verified. Please note that incomplete submissions will delay the review process.

PART A: APPLICANT'S GENERAL INFORMATION

Item	Document list	Has this been
#	bocument list	included in
#		vour
		submission?
		(Yes/No/N.A.)
1	Confirmation of payment of CI \$5,000 Application fee for licensing only	(165/NO/N.A.)
1		
_	(not applicable to waiver applications).	
2	Certificates of Incorporation - Certificates for the Applicant , and if	
	applicable, the Parent and Subsidiaries of the Applicant.	
3	Registered Office Agreement (Not applicable to waiver applications)	
4	Notarized/ Certified copy of Register of Members for the Applicant , and if	
	applicable, the Parent and Subsidiaries of the Applicant.	
	(Not applicable to waiver applications unless there is a change from	
	previous documents provided to the Authority)	
5	Notarized/ Certified copy of Register of Directors for the Applicant , and if	
	applicable, the Parent and Subsidiaries of the Applicant.	
	(Not applicable to waiver applications unless there is a change from	
	previous documents provided to the Authority)	
6	Business Plan: A comprehensive business plan inclusive at minimum	
	of the following:	
	i. A detailed description of the virtual asset-related business being	
	undertaken or to be conducted <i>Virtual Asset (Service Providers)</i>	
	Act (2024 Revision)	
	ii. Products and services being offered or to be offered in the future	
	and details on the process of how those services are being	
	offered.	
	iii. Proposed date to commence carrying out the provision of virtual	
	asset services in, or from within, the Cayman Islands	
	iv. Physical location of operations.	
	v. Delivery channels and marketing plan/strategy	



7	Transaction Flow Chart - visual illustration of the processes, in	
1	sequence, involved in a transaction, highlighting key interactions, decision	
	points, and data flows to ensure clarity on the virtual asset business.	
	, , , , , , , , , , , , , , , , , , , ,	
	*This requirement can be provided as a section of the Business Plan	
8	Customer Base Statement* detailing the Applicant's:	
	i. Expected client demographics and jurisdictions	
	ii. Assessment of target customer base (for example retail,	
	institutional, high-risk jurisdictions).	
	*This requirement can be provided as a section of the Business Plan	
9	Ownership structure – An organizational chart of the company	
	ownership structure including the names, registration/license number and	
	addresses of all subsidiary companies of the applicant.	
	- Where any of the entities within the company ownership	
	structure (including the ultimate parent entity) are regulated,	
	specify the relevant regulator.	
4.0	Bandal Charles of Bandal Larger at 1	
10	Regulated Status of Parent and Affiliated entities – outline the	
	regulatory status of the Applicant's parent and affiliated entities, including	
	any licenses, registrations, and compliance with relevant regulatory	
	requirements for each entity.	
11	Management Structure - Organizational Structure Chart & Key	
	Personnel Details*:	
	reisonnei betans .	
	i. Names, roles, and experience of key personnel e.g. composition	
	of board of directors, senior management.	
	ii. Organizational chart showing reporting lines and governance	
	structure.	
	*This requirement can be provided as a section of the Business Plan	
12	Financial Position*	
	i. Detailed proposal setting out the applicant's assets and	
	liabilities at the end of each year for the two years following the	
	submission of this application	
	ii. Estimate of the applicant's projected income at the end of each	
	year for the two years following the submission of this application	
	iii. Current financials: copy of Applicant's most recent balance sheet	
	and details of fee earnings, if any	
	*This manufacture has been been suited as a section of the Co.	
12	*This requirement can be provided as a section of the Business Plan	
13	Annual Accounts For each charabelder that is a body cornerate helding more than ten	
	For each shareholder, that is a body corporate holding more than ten	
	percent (10%) of the applicant's issued shareholding or total voting	
	rights, please provide:	
	- Annual accounts for the two years immediately preceding the	
	application	
	- Similar accounts for the parent body, if any, of each such of	
	the body corporate	
	(Not applicable to waiver applications)	



14	Capital: Information on and evidence of, the fully paid-up capital. (Not applicable to waiver applications)	
15	Capital Allocation Statement - A statement as to how much of the capital of each subsidiary company constitutes an asset of the applicant (if applicable). (Not applicable to waiver applications)	
16	Regulatory Capital Computation - calculation of the applicant's capital adequacy, ensuring compliance with section 8 of the Rule for Virtual Asset Custodians and Trading Platforms and any other relevant regulatory measures. (Not applicable to waiver applications)	
17	Regulatory Capital Stress Testing – outlines how the applicant intends to perform stress testing of its capital adequacy under various adverse scenarios to demonstrate compliance with section 8.8 of the Rule for Virtual Asset Custodians and Trading Platforms and its ability to withstand financial shocks. (Not applicable to waiver applications)	
18	Financial Statements Auditor Appointment Letter - The name and address of the firm of auditors practicing in the Islands and approved by the Authority that is appointed to audit the accounts of the applicant with a statement that notes: - the date for drawing up the annual accounts of the applicant, and; - evidence that the auditor has agreed to accept the appointment such as an Auditor Consent letter.	
19	(Not applicable to waiver applications) Exemption Request - (If Required) Request for an exemption from the requirements of the Virtual Asset (Service Providers) Act (2024 Revision), these Regulations or any other regulatory law made by the applicant.	
20	Other Regulated Activity - A statement indicating whether the applicant intends to provide any other services which are regulated in the Cayman Islands.	
21	Legal Opinion - Provide a legal opinion on how the applicant meets the requirement for registration or license under the VASP Act. The legal opinion may also consider and opine, as appropriate, whether the applicant's proposed activities would require license or registration under any other regulatory law(s).	
22	Waiver Supporting Evidence** – If applying for a waiver from the requirements of the Virtual Asset (Service Providers) Act (2024 Revision), provide a detailed explanation of the basis / rational for the waiver request including whether the virtual asset service materially changes the nature of the activity for which the existing Supervised person is regulated, all information on any existing registrations / licenses already held with the Authority and any other details as relevant. **This can be included within the Legal Opinion	



23	Entity Penalt	ties / Enforcement actions - records of any regulatory	
		nforcement actions imposed on the applicant, detailing the	
	regulatory req	violation, corrective measures taken, and compliance with juirements.	
24	Governance	Policy and Procedures – Applicant's framework for	
	_	ncluding roles, responsibilities, decision-making processes, mechanisms to ensure sound management and regulatory	
	compliance. (/	Not applicable to waiver applications)	
25		/ide Risk Management Policy - framework for identifying, naging, and mitigating risks across the entire organization	
	to ensure the	Applicant operates within acceptable risk levels. Include	
		of risks associated with VA services the Applicant intends to blicable to waiver applications)	
26		Program and Reporting Framework	
	_	FP/Sanctions Policy) - The Applicant's strategy to carry nce, money laundering, terrorism or proliferation financing	
		processes to ensure compliance with the <u>Virtual Asset</u>	
	-	<u>ders) Act (2024 Revision)</u> and the <u>Proceeds of Crime Act</u>	
	(2024 Revision Policy must at	minimum cover the following areas-	
	i.	AML/CFT/CPF/Sanctions Training	
	ii.	Customer Risk Assessment	
	iii.	Enterprise-Wide Risk Assessment	
	iv.	Client Due Diligence	
	v.	Eligible Introducers	
	vi.	Ongoing Monitoring	
	vii.	Sanctions Screening	
	viii.	SAR and FRA Reporting	
	ix.	Politically Exposed Persons (PEP)	
	x.	Transaction Monitoring	
	xi.	Employee Screening	
	xii.	Record Keeping	
	xiii.	Internal Audit	
	xiv.	Outsourcing	
	(Not applicable	e to waiver applications)	
27	Rule requirem	ents as applicable and in compliance with Part 10A of the oney Laundering Regulations (2025 Revision)	
		irement can be included as a section of the opliance Policy.	



28	Cybersecurity and technology – Provide an outline of strategy and measures in place for cybersecurity, risk management, the safeguard of virtual assets and internal controls within the business to prevent loss and theft. This should include: o IT Governance and Risk Management	
	o Cybersecurity Framework	
	 Safeguarding of virtual assets 	
	o Acceptable Use	
	o Data Protection	
	o Physical and logical access	
	Network Protection	
	 Encryption and Cryptography 	
	Software Development Lifecycle	
	o Change Management	
	o Incident Response	
	 Data Collection, Retention, and Disposal 	
	 Training and Awareness 	
	(Not applicable to waiver applications)	
29	Crypto Wallet Management Policy which includes: o Purpose and Scope	
	Roles & responsibilities	
	Wallet types & management	
	 Transaction Security 	
	Compliance and Regulatory Considerations	
	Incident Response	
	User Access Permissions	
	 Training and Awareness 	
	Wallet Auditing and Monitoring	
	 Periodic Review and Updates 	
	 Policy enforcement and Penalties 	
30	Private Key Management Policy – Provide the framework that defines the processes and controls for managing private keys used in cryptographic operations, ensuring their security, integrity, and availability while preventing unauthorized access or data breaches. This includes the private key lifecycle components such as generation, use, storage, backup, rotation, disposal etc.	
	Requirements can be included in the Crypto Wallet Management Policy.	



31	Outsourcing Policy - outlines the principles, criteria, procedures and standards for outsourcing. (Not applicable to waiver applications)
32	Outsourcing Log – the log should list all third-party outsourcing arrangements, as well as details on vendors and services provided. (Not applicable to waiver applications)
33	Outsourcing Agreements - Copies of: • executed service agreements for all material intergroup or affiliate services and • executed agreements with material externally outsourced services (as relevant). (Not applicable to waiver applications)
34	Business Continuity - strategies and procedures in place to ensure that critical business operations can continue in the event of disruptions, protecting the Applicant's operations, assets, and stakeholders. (Not applicable to waiver applications)
35	Complaints Handling Policy – outline of the process for receiving, investigating, and resolving client or stakeholder complaints, ensuring that issues are addressed in a fair and timely manner while maintaining customer satisfaction. (Not applicable to waiver applications)
36	Conflict of Interest Policy – outlines the applicant's measures to identify and prevent conflict of interest by management, staff and other stakeholders. This also includes insider trading or price manipulation. (Not applicable to waiver applications)
37	Recovery Plan – outline of the steps the institution will take to recover from a significant operational disruption, detailing recovery timelines, strategies, and roles to restore business operations efficiently. (Not applicable to waiver applications)



Mandatory documents continued - where applicable to the Applicant

Item #	Document list	Has this been included in your submission? (Yes/No/N.A.)
38	Notarized/Certified English Translations: Provide notarized or certified English translations for any of the above documents where the original is not in English.	
39	Proof of Registration/Licensing: Provide proof of registration, licensing, or application to be registered/licensed to conduct VASP and or Financial Service Provider (the "FSP") activities in another jurisdiction for the applicant, parents, and/or subsidiaries. If licensed and registered, include: i. Document of good standing ii. Confirmation of no adverse issues with the Applicant or any licensed or registered parent and/or subsidiaries	
40	Proof of Registration under Other Acts/Regulations: Provide proof of registration, licensing, or application under other Acts/Regulations under the Cayman Islands Monetary Authority.	
41	Change of Name Certificates: Provide any change of name certificates for applicants, parents and subsidiaries.	
42	Trust Deed, if applicable	
43	Proof of Controlling Interest: Provide proof of controlling interest held in other VASP entities.	
44	Proof of Penalties/Actions: Submit proof of any penalties or actions against the Applicant, its parents, and/or subsidiaries.	

Mandatory documents continued - for assessment of Finess and Propriety

(Not applicable to waiver applications)

Item #	Document list	Has this been included in your submission? (Yes/No/N.A.)
	For Shareholders, Directors and Senior Officers (the "individual") Not Known to the Authority:	
45	Personal Questionnaire (see link in the Appendix in Part F): along with documents, i.e. a final decision report, if any probity questions in section 7A of the PQ are answered "Yes".	
46	Police Clearance Certificate/Affidavit of No Conviction: Dated within six (6) months of application date.	
47	Character References: two (2) character references with at least a three (3) year relationship.	
48	Financial Reference: Financial reference must attest to the management of the individual's account. With a minimum business relationship of two (2) years.	
49	Curriculum Vitae: Chronological CV detailing full employment tenure.	
50	Notarized/Certified ID: Notarized or certified color copy of national identification.	



51	Notarized/Certified Qualifications: Notarized or certified copies of	
	educational and professional qualifications as listed on the CV.	
52	Source of Wealth Form (see link in Appendix 1): For individuals holding	
	more than 10% shareholding.	
53	Job Description: For individuals involved in day-to-day management of a	
	FSP, provide a signed and dated job description and organizational chart	
	showing reporting lines.	
	For Shareholders, Directors and Senior Officers Previously	
	Approved by the Authority:	
54	An updated and signed Personal Questionnaire, reflecting the name of	
	the current entity and proposed position.	
55	Affidavit of No Material Changes: Affidavit attesting to no material	
	changes in the personal questionnaire.	
56	Police Clearance Certificate/Affidavit of No Conviction: Dated within six	
	(6) months of application date.	

PART B: INFORMATION ON VIRTUAL ASSET CUSTODIAN

This Part is to be completed by all applicants who wish to offer *virtual asset custody services* in or from within the Islands.

Item #	Document list	Has this been included in your submission? (Yes/No/N.A.)
57	List of Virtual Assets Offered – indicate types and amounts of each virtual asset that the applicant intends to hold on behalf of its clients and reasons for facilitating the safekeeping of these virtual assets.	
58	Client Disclosure and Terms of Service - Provide a copy of any agreement, contract or disclosure which will be used during the provision of virtual asset custodial services. These documents should outline all information that will be provided to the owners of the virtual assets including, but not limited to: ofees, compensation structures, recourse available to the owners of the assets in event of loss, and methods by which the owners may access their virtual assets.	
59	Insurance Policy Document - Provide the details of any insurance arrangements held by the applicant in the Cayman Islands or in another jurisdiction which relates to the provision of the virtual asset custody services. Additionally, please outline the insurance coverage in place to protect client assets against risks such as theft, fraud, or loss while under the institution's custody, ensuring financial protection for clients, providing copies of policy documents where applicable.	



60	Proof of Professional Knowledge and Experience in custody	
	services: Evidence to support the availability to the applicant, at all	
1	times adequate professional knowledge and experience, this includes but	
	is not limited to	
	CVs/Resumes of Key Personnel:	
	 a) Individuals with adequate professional knowledge and experience operating a virtual asset custodial service. These should include their professional qualifications, relevant experience in the provision of virtual asset custodial services, and any certifications or training that demonstrate relevant expertise. b) At least two directors actively engaged in the business of the applicant, one of whom shall possess a sound professional knowledge of and experience in, provision of virtual asset custody services. 	
	Provide notarized proof of educational certificates/documents.	
62	Letter of Intent to Provide Services to Persons in the Islands -	
	Statement indicating whether the applicant intends to provide virtual	
	asset custodial services to persons in the Islands.	
63	Custody of Client Assets Policy - procedures and safeguards in place	
	for the safekeeping and protection of client assets, ensuring compliance	
	with relevant regulations and mitigating risks associated with asset	
	custody.	
64	Custody Services User Agreement - define the terms and conditions	
	under which custody services are provided to clients, detailing the rights and obligations of both parties, as well as the procedures for handling	
	and safeguarding client assets.	
65	Concentration Risk Policy – provide details on the strategy and	
	procedure of the Applicant for the identification and mitigation risks	
	arising from overexposure to a single counterparty, sector, or virtual	
	asset, ensuring that the institution maintains a diversified risk profile.	
66	Reconciliation Policy – provide the framework for regularly verifying	
	and reconciling financial records and transactions, ensuring accuracy and	
	identifying discrepancies to maintain operational integrity.	
67	Custody Services Outsourcing Agreement – Provide information	
	about contracts with affiliates or any other third parties regarding any	
	services related to the provision of virtual asset custody services which	
	will be outsourced or provided by a third party.	



PART C: VIRTUAL ASSET TRADING PLATFORM OPERATORS

This Part is to be completed by all applicants who wish to operate a **virtual asset trading platform** in or from within the Islands.

68. Location of Physical Hardware - Indicate where physical hardware supporting the trading platform will be located. 69. Names of Virtual Assets (Trading Platform) - Provide a list of virtual assets which will be listed, traded or exchanged by the virtual asset trading platform. 70. Client Disclosure and Terms of Service - Trading Platform - Provide a copy of the standard client agreements, contracts or disclosures which will be provided to the users of the virtual asset trading platform. Ensure that the document provided outlines all information that will be provided to the owners of the virtual assets including, but not limited to: - fees - compensation structures - recourse available to the owners of the assets in the event of loss and - the methods by which the owners may access their virtual assets. 71. Client Agreements / Terms and Conditions - Provide client agreements and terms by which each specific virtual asset will be listed, traded or exchanged on the virtual asset trading platform. 72. Additional client agreements / Terms and conditions - If the applicant will be providing lending, financing or leveraging of any kind to its clients, provide the proposed terms of these arrangements including any risk management disclosures and measures. 73. Virtual Asset listing due diligence - Provide a statement outlining the due diligence process which will be undertaken by the applicant when listing, trading or exchanging a new virtual asset. 74. Securities Listing - If the applicant will be facilitating the listing, trading or exchanging a new virtual asset. 75. Securities Listing of the types of securities, provide: - a description of the types of securities, - disclosures to be provided to clients relating to these securities, and - arrangements for and terms under which the securities will be listed on the trading platform. Include any additional detail, as necessary on ensuring compliance with regulatory standards and risk management.	Item #	Document list	Has this been
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processes, and requirements for listing and delisting financial	76.	Listing and Delisting Procedures – outline of the criteria,	



	instruments or assets on the platform, ensuring transparency and	
	regulatory compliance in the management of listed entities.	
77.	Letter of Intent to Provide Services to Persons in the Islands -	
	A statement setting out whether persons in the Cayman Islands will be	
	able to buy, sell, trade, exchange or list virtual assets on the trading	
	platform.	
78.	Proprietary Trading Policy	
	- Provide confirmation of, and reason for, any trading activity which	
	will be conducted by the applicant on its own account using virtual	
	assets which will be listed, traded or exchanged on the trading	
	platform.	
	- Outline of the guidelines and controls for the Applicant's trading	
	activities using its own capital, defining risk limits, compliance	
	requirements, and procedures to safeguard against excessive risk-	
	taking and to safeguard customers.	
79.	Trading Monitoring Policy - procedures for monitoring trading	
	activities to detect market abuse, unusual or potentially suspicious	
	behavior, ensuring compliance with regulatory requirements and	
	maintaining market integrity	
80.	Segregation of Funds - Provide details on how the Applicant will	
	ensure that client virtual assets and fiat are kept separate from the	
	company's proprietary virtual assets and fiat.	
81.	Client Deposits and Withdrawals Policy – Copy of the Applicant's	
	procedure and strategy for accepting and processing client deposits	
	and withdrawals, ensuring compliance with legal, regulatory, and	
00	operational standards.	
82.	Clearing and Settlement Policy – detailing the Applicant's processes	
	related to the clearing and settlement to be utilized by the trading platform in order to perfect trades and exchanges, with appropriate	
	risk management as relevant.	
83.	Proof of Professional Knowledge and Experience in Trading	
05.	Platforms : Evidence to support the availability to the applicant, at all	
	times adequate professional knowledge and experience, this includes	
	but is not limited to	
	CVs/Resumes of Key Personnel:	
	c) Individuals with adequate professional knowledge and	
	experience operating a virtual asset trading platform. These	
	should include their professional qualifications, relevant	
	experience in the provision of virtual asset trading services,	
	and any certifications or training that demonstrate relevant	
	expertise.	
	d) At least two directors actively engaged in the business of the	
	applicant, one of whom shall possess a sound professional	
	knowledge of and experience in, operating a virtual asset	
	trading platform.	
	Provide notarized proof of educational certificates or documents.	
	Provide notarized proof of educational certificates or documents.	



PART D: OTHER INFORMATION

a) For entities in a group or multi-jurisdictional entity, please indicate using the table below whether there is any regulatory oversight in any other jurisdiction providing details of the regulator, the regulated activities and if any regulatory or legal actions, penalties, or other concerns have been raised.

Please complete the table below for all the entities in the group:

TABLE 1

ENTITY	REGULATOR	REGULATED ACTIVITY	REGULATORY or LEGAL ACTIONS/ PENALTIES /CONCERNS

b) For the Shareholders, Ultimate Beneficial Owners, Beneficial Owners, Directors and Senior Officers please indicate if any regulatory or legal actions, penalties, or other concerns have been raised. Please complete the table below where applicable:

TABLE 2

NAME	POSITION	REGULATORY PENALTIES/LEGAL ACTIONS/CONCERNS	JURISDICTION	REGULATORY/LEGAL BODY



c) Kindly indicate (in the format below) the location and office address for the following activities, where applicable:

TABLE 3

Activities	Address/Location	Regulator (if unregulated please state)
Location of the Head Office		
Location of key personnel including directors, compliance officers, senior officers.		
If applicable, where virtual asset exchange services will be offered from		
Technology and IT infrastructure locations including critical hardware and software that supports key lifecycle management (including key generation and custody), wallet management, transaction processing, data storage, day to day business operations (finance, accounting, compliance etc.)		
 Record keeping where these occur separate from technology locations above (e.g. accounting records 		
Location of AML/CFT/CPF/ Sanctions compliance function including: Onboarding i.e. KYC/CDD Screening Transaction Monitoring		
Marketing and advertising		
Transaction Processing		
Operational and compliance support services such as HR, finance, legal, accounting, risk management, product development or treasury management.		
Any (other) third-party arrangements/ outsourced service providers (including log of all outsourced functions).		



To be completed by the Applicant.

PART E: DECLARATION

To be signed and submitted by two senior officers of the Applicant.
I,, (full name and address and position)
I,, (full name and address and position)
declare that we are duly authorised to make this application. We confirm that we have read and understood the provisions of the <i>Virtual Asset (Service Providers) Act (2024 Revision)</i> and the regulations made under it and the <i>Anti-Money Laundering Regulations (2025 Revision)</i> and we declare that the business in respect of which this application is made will be conducted in accordance with the law. We declare the information provided in the application to be accurate in all material aspects to the best of our knowledge and belief.
Signatures:
Date:



PART F. Appendix 1

Supporting Documents and FAQS:

Refer to the links below for links to the documents referenced above as well as guidance and general information regarding the VASP application process and requirements.

- Regulatory Policy Registration or Licensing of Virtual Asset Service Providers
- Regulatory Policy- Assessing Fitness and Propriety
- Statement of Guidance Nature, Accessibility and Retention of Records Statement of Guidance
- Statement of Guidance Outsourcing (for regulated entities)
- Statement of Guidance <u>Cybersecurity for Regulated Entities</u>
- Statement of Guidance Personal Questionnaire
- Source of Wealth Form
- Other Regulatory Measures: https://www.cima.ky/virtual-asset-service-providers-regulatory-measures
- General VASP FAQS: https://www.cima.ky/vasp-faq