



# Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

REEFS Form Completion Guide Application for Virtual Assets Service

Provider Registration (Ref: APP-101-84) Document version: 1.0 Version: 1.0

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Revision History: Effective Date Version Number Revision Description November 2020

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INTRODUCTION Regulatory Enhanced Electronic Forms Submission (REEFS), is an online portal for electronic submission of required financial services information to the Cayman Monetary Regulatory Authority International ( the Authority ) as well as providing payments information where applicable. 2 FORM INFORMATION Form APP-101-84 is to be used when applying to register as a Virtual Assets Service Provider. The to the left-hand side of the page, allow for multiple entries, when more than one is applicable for each category, throughout this form 2.1 VASP REGISTRATION PROCESS Registration form APP-101-84 and the Inherent Risk form AIR-157-84 have been packaged together into a new Process allowing them to be linked. This will ensure that BOTH forms are submitted to the Authority in order to satisfy the application process. Users will need to select the VASP Registration Process -- APP-101-84 which will open the initial Registration form. Once the registration form is completed and successfully submitted, the AIR-157-84 form will become available, and you will have the ability to go directly to the AIR-157-84 form, as shown below.

Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 5 of 28 3 ACCESSING AND SUBMITTING THE FORM 3.1 UNDERSTANDING

REEFS ROLES AND WORKFLOWS In REEFS, roles must be assigned to allow users to perform certain tasks (assigned in the Workflow). These roles give the users permission to prepare, edit, approve, review and submit etc. based on Workflows. Please use the online instructions for guidance on how to Create User accounts, Assign Roles and details of Workflows. 3.2 ROLES REQUIRED FOR APP-101-84 The following Roles are required for

access to this form: New Application Preparer role New Application role (this role inherits the above role) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider

Registration Page 6 of 28 3.3 WORKFLOW USED FOR APP-101-84 The following

Workflow is associated with APP-101-84. It outlines the steps that must be followed on both the Industry-side and the Authority-side. All steps in the workflow must be completed.

Steps taken on Industry-side: 1. The New Application Preparer prepares the data a. Once the data has been entered the New Application Preparer can Validate the data, and then either Save or delete all the data i. If Save is selected, the status of the application changes to Ready to Submit ii. The application is ready for review by the New Application role 2. Once the New Application role has reviewed the data they can then Validate the data once again a. Once the data has been validated the options to either Submit or Return becomes available i. If Return is selected, the data is then returned to the New Application Preparer for further review ii. If the Submit option is selected, it then goes to the Payment processor (if it is applicable) 1. The status of the application then changes to Submitted

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Steps taken on Authority-side: 1. Once the application has been Submitted to the Authority, an Analyst can then Claim the submission to begin the review process. a. Once the application has been Claimed, the status of the application changes to Application Under Review (Level 1) ( AUR\_L1 ) i. The application is then reviewed and validated by the Analyst 1. If the application is Returned by the Analyst, it is returned to industry to be resubmitted 2. If the application is accepted, it is escalated to the second level of review by a Senior Analyst, and the application status changes to Application Under Review (Level 2) ( AUR\_L2 ) i. If the application is Returned by the Senior Analyst, it is returned to the Analyst for further review ii. If the application is accepted it is escalated up to a Chief Analyst for final approval, and the application status changes to Waiting Final Approval 1. If the application is Returned by the Chief Analyst, it is returned to the Senior Analyst for further review 2. If the application is approved the status of the application changes to Approved 3. If the application is not approved, the status of the application changes to Refused 3.4

SUBMITTING / RESUBMITTING Pending 3.5 APPLICABLE FEE(S) The following fee is associated with form APP-101-84, which can be paid via inline escrow payment: KYD \$1,000.00 Assessment fee upon submission via REEFS For additional fee information, please refer to the regulations Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 8 of 28 4 COMPLETION INSTRUCTIONS ID Label Instructions Validation Rule Schedule A Applicant Details A01 Is Entity known to CMRAI? Select Yes or No as appropriate Mandatory field A01a Select known CMRAI Licensee or Registrant Name Once " Yes is selected, indicate if the entity is currently licensed by CMRAI under any of its regulatory laws and is conducting VAS under the same CMRAI license number. If VAS service is being conducted by a different entity affiliated with the CMRAI Licensed entity. The entity is required to register as NON-CMRAI/NEW. Mandatory field if A01 is Yes A01b Enter name of new Registrant NON-CMRAI Regulated Entity: Entities that currently do not hold a license under any of CMRAI regulatory laws but intends to conduct VAS or has been conducting VAS under other laws e.g. CEC entities. State the exact name under which registering entity have been incorporated as appear on all legal documents (e.g. Certificate of Incorporation, Certificate of Registration, Offering Document, Summary of Terms, Marketing Material, etc. including the appropriate uppercase/lowercase and punctuation marks). Mandatory field if A01 is No A02 Identify the services provided or to be provided in or from within the Islands: A02(i) VAS type Select the type of Virtual Assets Services from the options available within the dropdown list. Use the "+" button to add a many row as required. Mandatory field A02(ii) Provide/Intent to Select from the options available within the dropdown list. Use the "+" button to add a many row as required.

Mandatory field if details entered in A02(i) A02(iii) Date Use the date-picker to select a date

Mandatory field if details entered in A02(i) A03 Requested Registration Date Select date you wish the Authority to recognise your registration. Mandatory field A04 to A11 will be visible if A01 is No

A04 If the applicant has been incorporated or established under a previous or different name, provide

A04(i) Date of Incorporation/ Established Insert the formation date as it appears on the governing documents of the VASP. Use the "+" button to add a many row as required

Optional field A04(ii) Previous/Different Name State the exact names under which registering entity have been incorporated. This include change or names and other names that the entity actively operates under. (e.g. Certificate of Incorporation, Certificate of Registration, Offering Document, Summary of Terms, Marketing Material, etc. including the appropriate uppercase/lowercase and punctuation marks). Also include Name change document within the attachment

Optional field A04(iii) Jurisdiction Select all applicable jurisdictions from the options available within the drop-down list.

Optional field A05 Provide any trading names (current and previous) under which business has been conducted.

A05(i) Date of Incorporated/ Established Insert the formation date as it appears on the governing documents of the VASP. Use the "+" button to add a many row as required

Optional field Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 9 of 28

A05(ii) Previous Trading Names State all previous Name(s) under which the entity traded if different form the current name. State names as they appear within official Documents e.g. Offering Document, Summary of Terms, Marketing Material, etc. including the appropriate uppercase/lowercase and punctuation marks). Optional field

A05(iii) Current Trading Names State all current Names under which the entity trades. State names as they appear within official Documents e.g. Summary of Terms, Marketing Material, etc. including the appropriate uppercase/lowercase and punctuation marks). Optional field

A05(iv) Jurisdiction Select all applicable jurisdictions from the options available within the drop-down list.

Optional field A06 Date and places of formation (include any licence or registration in other jurisdictions):

A06(i) Date of Incorporated/ Established Insert the formation date as it appears on the governing documents of the VASP. Use the "+" button to add a many row as required

Optional field A06(ii) Jurisdiction Select the jurisdiction(s) in which the Registering entity has established/incorporated as it appears on the governing documents. Insert the formation date as it appears on the governing documents of entity(s) and Indicate all countries in which the registering entity have been incorporated or established, include entities that hold no license or registration by jurisdiction.

Optional field A06(iii) Registration or Licence Select Licence or Registration as appropriate

Optional field A07 Legal entity identifier (if available): If available, provide Legal Entity Identifier (LEI).

Optional field A08 Legal structure of applicant Select the appropriate legal structure from the drop-down list which corresponds with the governing documents of the registering entity.

Mandatory field if A01 is No

A09 Attach organisational chart if applicable Select browse and add/open the corresponding document. If there was a name change, also include this document within the attachment.

Optional field A10 Provide certificate of incorporation or registration or official record of formation: Select browse and add/open the corresponding document. If there was a name change, also include this document within the attachment.

Mandatory field if A01 is No

A11 Company, partnership or limited liability company registration number of the applicant: Add the entire alpha-numerical value listed on the Certificate of Incorporation including all letters, numbers and punctuation marks. This value is typically located within the top left corner of the Certificate of Incorporation/Registration from the Registrar.

Mandatory field if A01 is No

A11a FYE Month Select the day of the financial

year end from the options available within the drop-down list. Mandatory field if A01 is No  
A11b FYE DAY Select the month of the financial yearend from the options available within  
the drop-down list. Mandatory field if A01 is No A11c Reporting Currency Indicate the  
primary currency used Mandatory field if A01 is No A11d Accounting Principles Select  
the accounting principles from the options available within the drop-down list. Mandatory  
field if A01 is No A11e Auditing Standards Select the auditing standards from the options  
available within the drop-down list. Mandatory field if A01 is No A12 Blockchain address (if  
applicable) Add the entire alpha-numerical value listed including all letters, numbers and  
punctuation marks. Optional field A13 Is the applicant licensed or registered to conduct  
virtual asset services ( VAS ) business in another jurisdiction? Select Yes or No as  
appropriate Mandatory field A14 will be visible if A13 is Yes A14 If so, provide the following-  
A14(i) Jurisdiction Select the jurisdiction from the options available within the dropdown list.  
Use the "+" button to add as many rows as needed. Mandatory field if A13 is Yes A14(ii)  
Date VAS Business Started Use the date picker to add the correct date. Date should reflect  
the date the registering entity enters into Virtual Asset Service business. Mandatory field if  
A13 is Yes Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider  
Registration Page 10 of 28 A14(iii) Registration or Licence Select all applicable types from  
the options available within the drop-down list. Mandatory field if A13 is Yes A14(iv)  
License/Registration Number/ID Add the entire alpha-numerical value listed on the  
registration /licence approval certificate(s) or letter(s) issued by the appropriate Regulator(s).  
Mandatory field if A13 is Yes A14(v) Regulator Name Select the name of the regulator  
from the options available within the drop-down list. If the name of the Regulator is not  
available within the drop-down list, then scroll down to the bottom of the drop-down list and  
select the option for "Other...". Once this option has been selected, additional fields will  
populate where the name of the new regulator can be added. Mandatory field if A13 is Yes  
A14(vi) Type of VAS Select the type(s) of the virtual Assets Services from the options  
available within the drop-down list. If the type is not available within the drop-down list, then  
scroll down to the bottom of the drop-down list and select the option for "Other...". Once this  
option has been selected, additional fields will populate where the name of the new regulator  
can be added. Mandatory field if A13 is Yes A14(vii) Details of Other type Provide details  
as appropriate Mandatory field if A14(vi) is Other A14(viii) Requirements Indicate the  
details of all Requirements imposed per Registration and /or License by the issuing  
Regulator. Insert "Not Applicable" if not applicable. Mandatory field if A13 is Yes A14(ix)  
Restrictions Indicate the details of all Restrictions imposed per Registration and /or License  
by the issuing Regulator. Insert "Not Applicable" if not applicable. Mandatory field if A13 is  
Yes A14(x) Prohibitions Indicate the details of all Prohibitions imposed per Registration and  
/or License by the issuing Regulator. Mandatory field if A13 is Yes A14(xii) Office /  
Presence Indicate whether there is a physical office or presence have been established in  
each jurisdiction selected. Insert "Not Applicable" if not applicable. Mandatory field if A13 is  
Yes A15 Identify any virtual asset services provided in a jurisdiction other those listed in  
A14 A15(i) Jurisdiction Select all applicable jurisdictions from the options available within  
the drop-down list. Optional field A15(ii) Type of VAS Select the type(s) of the virtual Assets  
Services from the options available within the drop-down list. If the type is not available  
within the drop-down list, then scroll down to the bottom of the drop-down list and select the  
option for "Other...". Once this option has been selected, additional fields will populate where  
the name of the new regulator can be added. This include virtual assets services which you  
are NOT currently regulated. Use the "+" button to add as many rows as needed. Optional

field A15(iii) Details of Other Type (if applicable) Provide details as appropriate Mandatory field if A15(ii) is Other A16 Does the applicant hold or plan to acquire controlling interest in another person or legal arrangement engaged in virtual asset service in this or any other jurisdiction? Select as appropriate. Mandatory field A17 will be visible if A16 is Yes A17 Jurisdiction Select the jurisdiction from the options available within the dropdown list. Mandatory field if A16 is Yes A17(i) Holding Status Select the appropriate status from the options available within the dropdown list Mandatory field if A16 is Yes A17(ii) Entity Type Select the appropriate legal structure from the drop-down list which corresponds with the governing documents of the registering entity. Mandatory field if A16 is Yes Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 11 of 28 A17(iii) Entity Name State the exact names under which registering entity have been incorporated as appear on all legal documents (e.g. Certificate of Incorporation, Certificate of Registration, Offering Document, Summary of Terms, Marketing Material, etc. including the appropriate uppercase/lowercase and punctuation marks). Mandatory field if A16 is Yes A17(iv) Legal identifier (if any) If available, provide Legal Entity Identifier (LEI) (if Applicable). Optional field A17(v) Percentage Indicate the numeric value reflective of the percentage of controlling interest acquired/hold. Mandatory field if A16 is Yes A18 Have any penalties been imposed or enforcement actions taken in another jurisdiction? Select as appropriate Mandatory field A19 will be visible if A18 is Yes A19 Type of Penalty Once "Yes" has been selected, indicate all type(s) of penalties applied from the options available within the drop-down list (penalties include Administrative Fines, Civil Actions, Enforcement Actions Mandatory field if A18 is Yes A19(i) Details Indicate the details of all penalties imposed per by the issuing Regulator. Use the "+" button to add as many rows as required. Mandatory field if A18 is Yes A19(ii) Jurisdiction Select all applicable jurisdictions from the options available within the drop-down list. Mandatory field if A18 is Yes A19(iii) Regulator Name Select the name of the regulator from the options available within the drop-down list. If the name of the Regulator is not available within the drop-down list, then scroll down to the bottom of the drop-down list and select the option for "Other...". Once this option has been selected, additional fields will populate where the name of the new regulator can be added. Mandatory field if A18 is Yes A19(iv) Supporting Document Select browse and add/open the corresponding document. Optional field A20 to A21 will be visible if A01 is No A20 Primary Contact Name Provide details as appropriate Mandatory field if A01 is No A21 address Provide details as appropriate Mandatory field if A01 is No Schedule B Service Providers (this section is available if Entity is not known to CMRAI) B01 Name of Registered Office Select Registered Office from drop-down list Mandatory field if A01 is No FEE PAYMENTS B02 Fee Payments same as Register Office? Select as appropriate Mandatory field if A01 is No B03 If no, provide Name if Entity responsible for Ongoing Queries Provide details as appropriate Mandatory field if B02 is No B03a Building, Floor, Suite Building, Floor, Suite Optional field B03b Street Name and Number Street Name and Number Mandatory field if B02 is No B03c P.O. Box P.O. Box Mandatory field if B03g will be Cayman Islands B03d City City Mandatory field if B02 is No Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 12 of 28 B03e Province / State Province / State Mandatory field if B02 is No B03f ZIP / Postal Code ZIP / Postal Code Mandatory field if B02 is No B03g Country Country Mandatory field if B02 is No B03h Telephone Number Telephone Number Mandatory field if B02 is No B03i address address Mandatory field if B02 is No B04 Cayman Auditor (Local Audit sign-off) Indicate a Cayman Islands certified Auditor Mandatory field if A01 is No B05 Attach

Auditor's Consent Letter Select browse and add/open the corresponding document.

Mandatory field if A01 is No Schedule C Structure Corporate Legal Structures (C01 to C07 will be visible if A08 is a Corporate Structure ) C01 Attach Register of Directors Select browse and add/open the corresponding document. Mandatory field if A08 is a Corporate Structure Director Information (Persons) Indicate details of Supervisors and Members if entity is a foundation C02(i) CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Optional field C02(ii) Title Select from the options available within the drop-down list. Optional field C02(iii) First Name Complete as appropriate. Optional field C02(iv) Middle Name Complete as appropriate. Optional field C02(v) Last name Complete as appropriate. Mandatory field if name is entered in C02(iii) C02(vi) Date of Birth Use the date picker to add the correct date of birth. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(vii) Country of Birth Select the Country from the options available within the dropdown list Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(viii) Other Nationalities: Complete as appropriate. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(ix) Address Complete as appropriate. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 13 of 28 C02(x) Personal Questionnaire Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xi) Character Reference 1 Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xii) Character Reference 2 Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xiii) Bank Reference Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xiv) Police Clearance Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xv) Curriculum Vitae Select browse and add/open the corresponding document. Mandatory field if name is entered in C02(iii) and a CMRAI ID was not provided in C02i C02(xvi) Years of Experience (VASP Only) Indicate years of experience in the Virtual Asset Services ONLY. Mandatory field if name is entered in C02(iii) C02(xvii) VAS Professional Qualifications and Experience Complete as appropriate. Mandatory field if name is entered in C02(iii) C02(xviii) Other Information Complete as appropriate. Optional field C03 Corporate Director Name Insert the full name of corporate director. Indicate details of Corporate Supervisors and Members if entity is a foundation Optional field C04 Country of Formation Select the country from the options available within the dropdown list. Mandatory field if name is entered in C03 C05 CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Optional field C06 Legal Entity Identifier (LEI) If available, provide Legal Entity Identifier (LEI). Optional field Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 14 of 28 Details of Principals of Corporate Director (if applicable) C07(i) CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Use the "+" button to add as many rows as required. Optional field C07(ii) Title Select from the options available within the drop-down list. Optional field C07(iii) First name Complete as appropriate. Mandatory field if name is entered in C03 C07(iv) Middle Name Complete as appropriate. Optional field C07(v) Last name Complete as appropriate. Mandatory filed if name is

entered in C07(iii) C07(vi) Date of Birth Use the date picker to add the correct date of birth. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i)  
C07(vii) Country of Birth Select the Country from the options available within the dropdown list Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i)  
C07(viii) Other Nationalities Complete as appropriate. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i) C07(ix) Address Complete as appropriate. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i)  
C07(x) Personal Questionnaire Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i) C07(xi) Character Reference 1 Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i)  
C07(xii) Character Reference 2 Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider  
Registration Page 15 of 28 C07(xiii) Bank Reference Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i) C07(xiv) Police Clearance Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i)  
C07(xv) Curriculum Vitae Select browse and add/open the corresponding document. Mandatory filed if name is entered in C07(iii) and CMRAI ID was not entered in C07(i) C07(xvi) Years of Experience (VASP Only) Indicate years of experience in the Virtual Asset Services ONLY Mandatory filed if name is entered in C07(iii)  
C07(xvii) VAS Professional Qualifications and Experience Complete as appropriate. Mandatory filed if name is entered in C07(iii) C07(xviii) Other Information Complete as appropriate. Optional field Trust Structures (C08 will be visible if A08 is a Trust ) C08 Trustee Select the Trustee from the dropdown list Mandatory field if A08 is a Trust  
Partnerships (C09 to C11 will be visible if A08 is a Partnership ) C09 Name of General Partner Enter the name of the General Partner Mandatory field if A08 is a Partnership C10 Enter Legal Entity Identifier (LEI) If available, provide Legal Entity Identifier (LEI). Optional field Principals of the General Partner or Managing Members C11(i) CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Use the "+" button to add as many rows as required. Optional field C11(ii) Title Select from the options available within the drop-down list. Optional field C11(iii) First Name Complete as appropriate. Mandatory field if name is entered in C09 C11(iv) Middle Name Complete as appropriate. Optional field C11(v) Last name Complete as appropriate. Mandatory field if a name was entered in C11(iii) C11(vi) Date of Birth Use the date picker to add the correct date of birth. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider  
Registration Page 16 of 28 C11(vii) Country of Birth Select the Country from the options available within the dropdown list Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(viii) Other Nationalities: Complete as appropriate. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i)  
C11(ix) Address Complete as appropriate. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(x) Personal Questionnaire Select browse and add/open the corresponding document. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(xi) Character Reference 1 Select browse and add/open the corresponding document. Mandatory field if a name was entered



in C11(iii) and CMRAI ID was not provided in C11(i) C11(xii) Character Reference 2 Select browse and add/open the corresponding document. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(xiii) Bank Reference Select browse and add/open the corresponding document. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(xiv) Police Clearance Select browse and add/open the corresponding document. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) C11(xv) Curriculum Vitae Select browse and add/open the corresponding document. Mandatory field if a name was entered in C11(iii) and CMRAI ID was not provided in C11(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 17 of 28 C11(xvi) Years of Experience (VASP Only) Indicate years of experience in the Virtual Asset Services Mandatory field if a name was entered in C11(iii) C11(xvii) VAS Professional Qualifications and Experience Complete as appropriate. Mandatory field if a name was entered in C11(iii) C11(xviii) Other Information Complete as appropriate. Optional field Senior Officers (excluding AML officers, see section below) C12(i) CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Use the "+" button to add as many rows as required. Optional field C12(ii) Title Select from the options available within the drop-down list. Optional field C12(iii) First Name Complete as appropriate. Mandatory field C12(iv) Middle Name Complete as appropriate. Optional field C12(v) Last name Complete as appropriate. Mandatory field C12(vi) Date of Birth Use the date picker to add the correct date of birth. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(vii) Country of Birth Select the Country from the options available within the dropdown list Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(viii) Other Nationalities: Complete as appropriate. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(ix) Address Complete as appropriate. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(x) Personal Questionnaire Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(xi) Character Reference 1 Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 18 of 28 C12(xii) Character Reference 2 Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(xiii) Bank Reference Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(xiv) Police Clearance Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(xv) Curriculum Vitae Select browse and add/open the corresponding document. Mandatory field if name is entered in C12(iii) and a CMRAI ID was not entered in C12(i) C12(xvi) Position Title Indicate years of experience in the Virtual Asset Services Mandatory field C12(xvii) Years of Experience (VASP Only) Complete as appropriate. Mandatory field C12(xviii) VAS Professional Qualifications and Experience Complete as appropriate. Mandatory field C12(xix) Other Information Complete as appropriate. Optional field Shareholders: (list all shareholders and beneficial interest holders who are natural persons) C13(i) CMRAI ID (if applicable) Enter the unique 7-digit number the Director has been assigned by the Authority. Use the "+" button to add as many rows as required. Optional field C13(ii) Title Select from

the options available within the drop-down list. Optional field C13(iii) First Name/Corporate Name Insert the first name of the shareholder (for individuals) or the full name of corporate shareholder. Mandatory field C13(iv) Middle Name Complete as appropriate. Optional field C13(v) Last name Enter the last name of shareholder (for individuals) Optional field C13(vi) Date of Birth / Formation Use the date picker to add the correct date of birth. Mandatory field if name is entered in C13(iii) and a CMRAI ID was not entered in C13(i) C13(vii) Country of Birth / Formation Select the Country from the options available within the dropdown list Mandatory field if name is entered in C13(iii) and a CMRAI ID was not entered in C13(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 19 of 28 C13(viii) Address Complete as appropriate. Mandatory field if name is entered in C13(iii) and a CMRAI ID was not entered in C13(i) C13(ix) Primary country of residence / place of business Select the Country from the options available within the dropdown list Mandatory field if name is entered in C13(iii) and a CMRAI ID was not entered in C13(i) C13(x) Percentage holding Indicate the numeric value representing the percentage of shares hold. Mandatory field C13(xi) Type of share Select the type of shares from the options available within the drop-down list. Mandatory field C13(xii) Number of Shares Insert the number of shares Mandatory field C13(xiii) Ultimate Beneficial Owner? If the shareholder is a beneficial Owner, select "Yes"; otherwise, select "No". Mandatory field C13(xiv) Nominee shareholder? If the VASP has Nominee shareholder, select "Yes"; otherwise, select "No". A nominee is a person or entity into whose name shares or other properties are transferred to/held on behalf of the nominator to facilitate transactions while leaving the nominator as the actual beneficial owner. Mandatory field C14 Attach Shareholder register Select browse and add/open the corresponding document. If there was a change, also include this document within the attachment. Browse and upload register Supervisors and Members if entity is a foundation Mandatory field Schedule D AML Officers D00i Is the AML function outsourced? If the AML function is outsourced, select "Yes"; otherwise, select "No". Mandatory field D00ii AML/CFT service provider name If the AML function is outsourced, insert the name of the AML/CFT service provider. Mandatory field if D00i is Yes D00iii AML/CFT service provider country If the AML function is outsourced, select the country in the dropdown list from which the appointed AML/CFT service provider operates. Mandatory field if D00i is Yes D00iv AML/CFT service provider address If the AML function is outsourced, insert the address of the AML/CFT service provider. Mandatory field if D00i is Yes Details of Anti-Money Laundering Compliance Officer (AMLCO) D01 CMRAI ID (if known) Insert the unique 7 digits number provided by the Authority, e.g. director ID if known. If an ID number has been issued by the Authority, this number is required to ensure accurate records. Optional field D02 Prefix Select from the options available within the drop-down list, e.g. Mr, Mrs, etc. Optional field D03 First Name Complete as appropriate. Mandatory field D04 Middle Name Complete as appropriate. Optional field D05 Last Name Complete as appropriate. Mandatory field D06 Date of Birth Use the date picker to add the correct date of birth. Mandatory field if CMRAI ID was not provided in D01 D07 Country of Birth Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D01 Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 20 of 28 D08 Gender Select from the options available within the drop-down list, i.e. male or female. Mandatory field if CMRAI ID was not provided in D01 D09 Other names (Aliases) Complete as appropriate. Optional field D10 Occupation Title The current position with the employer. Mandatory field if CMRAI ID was not provided in D01 D11 Employer Complete as

appropriate. Mandatory field if CMRAI ID was not provided in D01 D12 P.O. Box Complete as appropriate. Mandatory field if D16 will be Cayman Islands D13 Street Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D14 City Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D15 State / Province Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D16 Country Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D01 D17 Zip / Postal Code Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D18 Number Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D19 Facsimile Number Complete as appropriate. Optional field D20 Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D01 D21 CV / Resume Select browse and add/open the corresponding document. Mandatory field if CMRAI ID was not provided in D01 D22 Qualifications: D22(i) Description Complete as appropriate. Optional field D22(ii) Date Use the date picker to add the correct date. Mandatory field if description is entered in D22(i) D22(iii) Accrediting Body Complete as appropriate. Mandatory field if description is entered in D22(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 21 of 28 D22(iv) Type Select from the options available within the drop-down list, i.e. Academic or Professional. Mandatory field if description is entered in D22(i) Details of Deputy Anti-Money Laundering Compliance Officer (DAMLCO) D23 CMRAI ID (if known) Insert the unique 7 digits number provided by the Authority, e.g. director ID if known. If an ID number has been issued by the Authority, this number is required to ensure accurate records. Optional field D24 Prefix Select from the options available within the drop-down list Optional field D25 First Name Complete as appropriate. Mandatory field if CMRAI ID was provided in D23 D26 Middle Name Complete as appropriate. Optional field D27 Last Name Complete as appropriate. Mandatory field if CMRAI ID was provided in D23 D28 Date of Birth Use the date picker to add the correct date of birth. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D29 Country of Birth Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D30 Gender Select from the options available within the drop-down list, i.e. male or female. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D31 Other names (Aliases) Complete as appropriate. Optional field D32 Occupation Title The current position with the employer. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D33 Employer Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D34 P.O. Box Complete as appropriate. Mandatory field if D38 will be Cayman Islands D35 Street Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 22 of 28 D36 City Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D37 State / Province Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D38 Country Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D39 Zip / Postal Code Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D40 Number Complete as appropriate. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D41 Facsimile Number Complete as appropriate. Optional field D42 Address Complete as appropriate.

Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D43 CV / Resume Select browse and add/open the corresponding document. Mandatory field if CMRAI ID was not provided in D23 and name was entered in D25 D44 Qualifications: D44i Description Complete as appropriate. Optional field D44ii Date Use the date picker to add the correct date. Mandatory field if description is entered in D44(i) D44iii Accrediting Body Complete as appropriate. Mandatory field if description is entered in D44(i) D44iv Type Select from the options available within the drop-down list, i.e. Academic or Professional. Mandatory field if description is entered in D44(i) Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 23 of 28

Details of Money Laundering Reporting Officer (MLRO) D45 CMRAI ID (if known) Insert the unique 7 digits number provided by the Authority, e.g. director ID if known. If an ID number has been issued by the Authority, this number is required to ensure accurate records. Optional field D46 Prefix Select from the options available within the drop-down list, e.g. Mr, Mrs, etc. Optional field D47 First Name Complete as appropriate. Mandatory field D48 Middle Name Complete as appropriate. Optional field D49 Last Name Complete as appropriate. Mandatory field D50 Date of Birth Use the date picker to add the correct date of birth. Mandatory field if CMRAI ID was not provided in D45 D51 Country of Birth Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D45 D52 Gender Select from the options available within the drop-down list, i.e. male or female. Mandatory field if CMRAI ID was not provided in D45 D53 Other names (Aliases) Complete as appropriate. Optional field D54 Occupation Title The current position with the employer. Mandatory field if CMRAI ID was not provided in D45 D55 Employer Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D56 P.O. Box Complete as appropriate. Mandatory field if D60 will be Cayman Islands D57 Street Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D58 City Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D59 State/ Province Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D60 Country Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D45 D61 Zip / Postal Code Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D62 Number Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D63 Facsimile Number Complete as appropriate. Optional field Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 24 of 28 D64 Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D45 D65 CV / Resume Select browse and add/open the corresponding document. Mandatory field if CMRAI ID was not provided in D45 D66 Qualifications: D66(i) Description Complete as appropriate. Optional field D66(ii) Date Use the date picker to add the correct date. Mandatory field if description is entered in D66(i) D66(iii) Accrediting Body Complete as appropriate. Mandatory field if description is entered in D66(i) D66(iv) Type Select from the options available within the drop-down list, i.e. Academic or Professional. Mandatory field if description is entered in D66(i) Details of Deputy Money Laundering Reporting Officer D67 CMRAI ID (if known) Insert the unique 7 digits number provided by the Authority, e.g. director ID if known. If an ID number has been issued by the Authority, this number is required to ensure accurate records. Optional field D68 Prefix Select from the options available within the drop-down list, e.g. Mr, Mrs, etc. Optional field D69 First Name Complete as appropriate. Mandatory field D70 Middle Name Complete as appropriate. Optional field D71 Last Name Complete as appropriate. Mandatory field D72 Date of Birth

Use the date picker to add the correct date of birth. Mandatory field if CMRAI ID was not provided in D67 D73 Country of Birth Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D67 D74 Gender Select from the options available within the drop-down list, i.e. male or female. Mandatory field if CMRAI ID was not provided in D67 D75 Other names (Aliases) Complete as appropriate. Optional field D76 Occupation Title The current position with the employer. Mandatory field if CMRAI ID was not provided in D67 D77 Employer Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D78 P.O. Box Complete as appropriate. Mandatory field if D82 will be Cayman Islands D79 Street Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 25 of 28 D80 City Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D81 State/ Province Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D82 Country Select from the options available within the drop-down list. Mandatory field if CMRAI ID was not provided in D67 D83 Zip / Postal Code Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D84 Number Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D85 Facsimile Number Complete as appropriate. Optional field D86 Address Complete as appropriate. Mandatory field if CMRAI ID was not provided in D67 D87 CV / Resume Select browse and add/open the corresponding document. Mandatory field if CMRAI ID was not provided in D67 D88 Qualifications: D88(i) Description Complete as appropriate. Optional field D88(ii) Date Use the date picker to add the correct date. Mandatory field if description is entered in D88(i) D88(iii) Accrediting Body Complete as appropriate. Mandatory field if description is entered in D88(i) D88(iv) Type Select from the options available within the drop-down list, i.e. Academic or Professional. Mandatory field if description is entered in D88(i) Schedule E Virtual Asset Services Provided Provide the following for each virtual asset service provided or to be provided E01(i) Type of Virtual Asset Service Select the Virtual Asset Services from the options available within the drop-down list. If the name of the Virtual Asset Service is not available within the drop-down list, then scroll down to the bottom of the drop-down list and select the option for "Other...". Once this option has been selected, additional fields will populate where the name of the new type of VAS can be added. At least one selection is mandatory. E01(ii) Type of Virtual Asset Service: Other (if applicable) Provide details as appropriate Mandatory field if E01(i) is Other E01(iii) Revenue Type (Actual or Projected Values) Select as appropriate from drop-down list Mandatory field E01(iv) VAS Value/Revenue Select as appropriate from drop-down list Mandatory field E01(v) Value (USD) Complete as appropriate Mandatory field Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 26 of 28 E01(vi) How VAS is being offered Select the how Virtual Asset Services are being offered from the options available within the drop-down list Mandatory field E01(vii) How Public Receive VAS Select the how Virtual Asset Services are being offered from the options available within the drop-down list. i.e. Direct, Third Party, other virtual platform delivery channels. Mandatory field E01(viii) Nature Complete as appropriate. Nature include fungibility, reliance on cryptography and use of DLT or Similar technology, volatility (stable or non-backed) Mandatory field E01(ix) Function Complete as appropriate. Functions include Payment and exchanges, investment / Securities, Utility Access. Mandatory field E01(x) Purpose Complete as appropriate. Purpose includes transaction speed, created purpose, Mandatory field E01(xi) Attach Document with details Select browse and add/open the corresponding document e.g.

Business plan/case and VA Valuation Methodology Optional field List the types of virtual assets which will be utilized while providing the virtual asset service: E02(i) Type of VAS Select the "Virtual Asset Types (i.e. bitcoin, "Ethereum, ripple etc) from the options available within the drop-down list. If the name of the Virtual Asset Type is not available within the drop-down list, then scroll down to the bottom of the drop-down list and select the option for "Other...". Once this option has been selected, additional fields will populate where the name of the new type of VAS can be added. Use the "+" button to add a many row as required. At least one selection is mandatory. E02(ii) Virtual Asset Types: Other (if applicable) Enter details as appropriate Mandatory field if E02(i) is Other E02(iii) Total Digital Assets USD Indicate the Monetary value of the Virtual Assets Mandatory field E02(iv) Number of Clients (if Applicable) Indicate the number of the Virtual Assets per asset type. Optional field List any identified risks associated with the virtual asset service, including data security risks, and steps put in place to mitigate these risks, including any insurance arrangements: E03(i) Type of VAS Select the Virtual Asset Services from the options available within the drop-down list. If the name of the Virtual Asset Service is not available within the drop-down list, then scroll down to the bottom of the drop-down list and select the option for "Other...". Once this option has been selected, additional fields will populate where the name of the new type of VAS can be added. At least one selection is mandatory. E03(ii) Other (if applicable) Enter details as appropriate Optional field if E03(i) is Other E03(iii) Associated Risk type (including data security risks) Select the risk type from the options available within the drop-down list. Mandatory field E03(iv) Risk Other (if applicable) Enter details as appropriate Mandatory field if E03(iii) is Other E03(v) Mitigating Steps Insert details of the risk type selected above. Please do not insert a comment to refer to specific pages of the any documents uploaded but rather insert a brief summary or copy text from the document which explains the actual mitigating steps. Mandatory field E03(vi) Policy Documents (if applicable) Select browse and add/open the corresponding document. Optional field E04a Attach cyber security program policy Select browse and add/open the corresponding document. Mandatory field Version: 1.0 APP-101-84 - Application for Virtual Assets Service Provider Registration Page 27 of 28 E04b Attach customer private key storage policy Select browse and add/open the corresponding document. Optional field Provide details on the procedures put in place in accordance with the Law to combat money laundering, terrorist financing and proliferation financing and to ensure compliance with Anti-Money Laundering Regulations: E05(i) AML/CFT/PF/TFS Policies and Procedures Insert the name(s) of the specific policies and procedures or contents thereof. Please do not insert a comment to refer to specific pages of the any documents uploaded but rather insert a brief summary or copy text from the document which explains the actual mitigating steps. At least one selection is mandatory. E05(ii) Details Insert details of the policies and procedure stated above. This includes how the Applicant will comply with the Travel Rule related provisions as outlined in the AMLRs, details of the compliance arrangements, including the relevant policies and procedures and the use of resources (including technological tools). Please do not insert a comment to refer to specific pages of the any documents uploaded but rather insert a brief summary or copy text from the document which explains the actual mitigating steps. Mandatory field if details were entered in E05(i) E05(iii) Policy Documents Select browse and add/open the corresponding document, including documents relating to Travel Rule compliance. If there was a name change, also include this document within the attachment. Optional field E06 Provide an outline of internal safeguards and data protection systems that will be put in place to protect the assets and data of clients: E06(i) Details Insert details of

the policies and procedures on for data protection. Please do not insert a comment to refer to specific pages of the any documents uploaded but rather insert a brief summary or copy text from the document which explains the actual policies and procedures Mandatory field E06(ii) Attach supporting documentation Select browse and add/open the corresponding document. Optional field E07 Internal Safeguards Asset protection (Business Model Description, Business strategy and Risk Appetite) E07(i) Details Insert details of the policies and procedures on for data protection. Please do not insert a comment to refer to specific pages of the any documents uploaded but rather insert a brief summary or copy text from the document which explains the actual policies and procedures Mandatory field E07(ii) Attach supporting documentation Select browse and add/open the corresponding document. Optional field E08 Provide the financial records of the applicant for the last two years showing past revenue, assets and liabilities, if available, and projected revenue and expenses and an outline of capital which will be available to support the applicant: E08(i) Last Year Select browse and add/open the corresponding document. Attachments should reflect the Last Financial year Optional field E08(ii) Prior Year Select browse and add/open the corresponding document. Attachments should reflect the year prior to the Last Financial Optional field E09 Will the service provider be engaged in any securities investment business as defined under the Securities Investment Business Law? Select Yes or No as appropriate. If Yes, select the business activities from the options below: Mandatory field E10a Securities Advisor Select Yes or No as appropriate. Mandatory field if E09 is Yes E10b Securities Arranger Select Yes or No as appropriate. Mandatory field if E09 is Yes E10c Securities Manager Select Yes or No as appropriate. Mandatory field if E09 is Yes E10d Broker Dealer Select Yes or No as appropriate. Mandatory field if E09 is Yes E10e Market Maker Select Yes or No as appropriate. Mandatory field if E09 is Yes E11 Will the service provider be issuing virtual assets as defined under the Virtual Asset (Service Providers) Law? Select Yes or No as appropriate. Mandatory field Version: 1.0

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5 REUSING PREVIOUS SUBMISSIONS What is XBRL ? XBRL (eXtensible Business Reporting Language), is a standards-based way to communicate and exchange business information between business systems. Data can be used from another APP-101-84 form instead of starting from fresh. You must have entered data into at least one form using the online portal and have successfully validated it. Example: Rapidly re-using another APP-101-84 application Process: 1. Select Submitted Requests to view previously submitted forms and select the one that contains the data. 2. Click on Download: XBRL Instance in the top right corner and save the file to your PC or network drive. 3. Close the form. 4. Select New Request and select the required new/empty form (e.g. APP-101-84). 5. Click on Upload: XBRL Instance in the top right corner. 6. Click on Browse... and navigate to the file that was saved in step 2 above (usually in the "Downloads" folder). 7. Click Upload . 8. The system will then copy each data point from the XBRL file into the fields of the current form. 9. The system displays the message Import Successful to indicate that the data was all copied OK. 10. The user can then review and alter the data as required. Note that any file attachments are not copied in by the download and upload processes. 11. Proceed as usual through the rest of the validation process. These instructions can be used for New Application forms, Change Request forms and Financial Returns. 6 TROUBLESHOOTING Validation Errors will prevent the submission of a form, however, Cautions do not. 6.1 COMMON VALIDATION RULES Pending 6.2 UNDERSTANDING OTHER ERRORS Pending