

Supplemental Documentation Checklist for Crypto Asset Trading Platforms

Refer to the table below for a list of supporting information and other materials that CTPs must provide with their application for membership or change in business request. The items listed below are supplemental to items on the *Membership Application – Documentation Checklist*.

Requested Information and Materials			Attached / Complete	N/A	
1	BUSINESS AND FINANCIAL OPERATIONS				
1.1	List of Cryptocurrencies and other Digital Assets	Provide a list of all the cryptocurrencies and other digital assets that the firm will trade, deal or offer to clients.	<input type="checkbox"/>	<input type="checkbox"/>	
1.2	Due Diligence for Coins	Provide samples of the firm’s due diligence for its top 6 coins (by value).	<input type="checkbox"/>	<input type="checkbox"/>	
1.3	Due Diligence for Staking	If the firm intends to offer staking to clients, provide a copy of: (i) the firm’s due diligence for staking service providers; and (ii) samples of due diligence performed to vet staking pools.	<input type="checkbox"/>	<input type="checkbox"/>	
1.4	Custody Solution	Ensure the firm’s custody solution is identified.	<input type="checkbox"/>	<input type="checkbox"/>	
1.4.1	External Custody	If the firm is using external custody, provide the following for each custodian: (i) the name of the custodian and its regulator; (ii) a copy of the signed custodial agreement (i.e., signed by the firm and its custody provider); (iii) a report on controls (SOC 2, type 2 reports); (iv) proof of insurance that covers the assets custodied on the firm’s behalf; and (v) audited financial statements.	<input type="checkbox"/>	<input type="checkbox"/>	
1.4.2	Internal Custody	For firms planning on self-custody for any portion of client assets, please provide a report on controls (i.e., SOC 2, type 2 report).	<input type="checkbox"/>	<input type="checkbox"/>	
1.5	Custody Partitions	Provide a detailed diagram(s) of the custody partitions and include the following supporting information & materials: (i) describe the use case(s) for the partition; (ii) provide a summary of the governance rules applicable to the partition, including a description of any whitelisting of receipts or deliveries; (iii) indicate whether the partition is connected to the Internet, or to the firm’s infrastructure; and (iv) describe the controls that are in place to limit the movement of funds from the partition.	<input type="checkbox"/>	<input type="checkbox"/>	
1.6	Liquidity Providers	Provide the names of all the firm’s liquidity providers.	<input type="checkbox"/>	<input type="checkbox"/>	

Requested Information and Materials			Attached / Complete	N/A
1.7	Warm Wallets / Hot Wallets	If the firm uses warm or hot wallets: (i) provide a copy of the policies and procedures that address how the firm determines what coins to move into cold, warm, and/or hot storage; and (ii) explain how the firm monitors for compliance with any applicable limits; and (iii) provide samples of reports or other system output that indicate the levels in cold, warm, and hot storage at a particular time.	<input type="checkbox"/>	<input type="checkbox"/>
1.8	Hardware Infrastructure	Provide a detailed description of the hardware infrastructure used in connection with the firm's wallet solutions and its ownership. If the hardware is owned by a third party, describe what terms govern its use.	<input type="checkbox"/>	<input type="checkbox"/>
1.9	Process for Internal Account Ledger Adjustments	If the firm intends to offer staking to clients, provide a detailed description and cradle to grave diagram of the process for internal account ledger adjustments for crypto asset rewards obtained if a client stakes their crypto assets.	<input type="checkbox"/>	<input type="checkbox"/>
1.10	Customer and Proprietary Holdings	Provide a copy of the "snapshots" of the firm's customer and proprietary holdings, reconciled to wallet positions, and if necessary, a reconciliation between the systems.	<input type="checkbox"/>	<input type="checkbox"/>
1.11	Insurance Policy	Provide evidence that the firm's insurance policy covers digital assets.	<input type="checkbox"/>	<input type="checkbox"/>
1.12	Becoming a Marketplace	If the firm is applying to become a Marketplace: <ul style="list-style-type: none"> ▪ refer to the requirements described in the "Becoming a Regulated Marketplace" page of the CISO website; and ▪ provide a copy of the required Form 21-101F2 (F2) filed with the CSA. 	<input type="checkbox"/>	<input type="checkbox"/>
2	CLIENT ONBOARDING, ACCOUNT DOCUMENTS AND DISCLOSURES			
2.1	Risk Statements for Coins	Provide copies of the risk statements to be provided to clients for individual coins. If there are no tailored risk statements, provide a copy of the general risk statement that will be provided to clients.	<input type="checkbox"/>	<input type="checkbox"/>
2.2	Risk Acknowledgements	Provide copies of the risk acknowledgement that will be provided to clients.	<input type="checkbox"/>	<input type="checkbox"/>
2.3	Suitability Waiver (for OEO firms)	Provide a copy of the firm's suitability waiver and describe how the client will provide written acknowledgement of the waiver. (Ensure that the firm's client account opening forms and client reporting indicate, "Order-Execution Only account" or similar verbiage.)	<input type="checkbox"/>	<input type="checkbox"/>
2.4	Account Appropriateness	Provide a copy of the firm's account appropriateness questionnaire and describe how and when this information will be gathered and assessed.	<input type="checkbox"/>	<input type="checkbox"/>

Requested Information and Materials			Attached / Complete	N/A
2.5	Investment Tools for Clients	Provide a list of any investment tools that the firm intends to make available to clients.	<input type="checkbox"/>	<input type="checkbox"/>
3	POLICIES, PROCEDURES AND SUPERVISION			
3.1	Policies/Procedures for FINTRAC's Travel Rule	Provide a copy of the firm's policies and procedures for achieving compliance with FINTRAC's Travel Rule.	<input type="checkbox"/>	<input type="checkbox"/>
3.2	Policies & Procedures for Forks and Airdrops	Provide a copy of the firm's policies and procedures for handling forks & airdrops.	<input type="checkbox"/>	<input type="checkbox"/>
3.3	Copy of FINTRAC Review	If the firm is registered as a money services business, provide a copy of the most recent review conducted by FINTRAC of the firm's operations.	<input type="checkbox"/>	<input type="checkbox"/>
4	EXEMPTIVE RELIEF			
4.1	Application for Exemptive Relief from IDPC Rules	<p>If the firm is applying for exemptive relief from any requirements of the Investment Dealer and Partially Consolidated Rules (IDPC Rules), provide the business case for the exemption, including:</p> <ul style="list-style-type: none"> ▪ the specific IDPC Rules from which the firm is requesting exemptive relief; ▪ the relevant facts and the reason(s) the firm is applying for exemptive relief; ▪ the rationale supporting the application, including policy reasons or prior CIRO decisions; and ▪ any supporting documentation. <p><i>Refer to CIRO Guidance Note GN-1300-21-001 Exemption Applications Relating to CIRO Rules for information on exemption applications.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	Application for Exemptive Relief from CSA Requirements	If the firm is applying for exemptive relief from the requirements of any CSA requirements (e.g., any requirements of a National Instrument), provide a copy of the application for exemptive relief that was submitted to the CSA.	<input type="checkbox"/>	<input type="checkbox"/>