



HELLENIC REPUBLIC
CAPITAL MARKET COMMISSION

DECISION
8/1059/30.07.2025
of the Board of Directors

Subject: Procedure and manner of submitting an application for authorisation of a crypto-asset service provider in accordance with Regulation (EU) 2023/1114

**THE BOARD OF DIRECTORS
OF THE HELLENIC CAPITAL MARKET COMMISSION**

Having regard to:

1. The enabling provision of article 124 (4) of Law 5193/2025 "Strengthening the capital market and other provisions" (Government Gazette A 56/11.04.2025).
2. Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937.
3. Commission Delegated Regulation (EU) 2025/305 of 31 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider.
4. Commission Implementing Regulation (EU) 2025/306 of 31 October 2024 laying down implementing technical standards for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to standard forms, templates and procedures for the information to be included in the application for authorisation as a crypto-asset service provider and related entities.
5. The provisions of Articles 95-115 and 124-126 of Law 5193/2025 on "Strengthening the capital market and other provisions" (Government Gazette A/56/11.04.2025), on adopting measures for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending

Regulations (EU) 1093/2010 and (EU) 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937.

6. Article 13 (2) of Law 2166/1993 (Government Gazette A 137), as amended by Article 18 (3) of Law 2198/1994 (Government Gazette A 43) and replaced by Article 39 (6) of Law 2324/1995 (Government Gazette A 146).
7. Article 90 of Presidential Decree 63/2005 "Codification of Legislation on the Government and Government Bodies" (Government Gazette A 98/2005).
8. The fact that the provisions hereof establish a new administrative procedure officially titled: "Procedure and manner of submitting an application for authorisation of a crypto-asset service provider in accordance with Regulation (EU) 2023/1114"

DECIDES UNANIMOUSLY

Article 1

Subject matter

This Decision sets out how, when and how to apply for authorisation of a crypto-asset service provider before the Hellenic Capital Market Commission, in accordance with Article 62 of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets and amending Regulations (EU) 1093/2010 and (EU) 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937, Article 2 of Commission Implementing Regulation (EU) 2025/306 of 31 October 2024 laying down implementing technical standards for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to standard forms, templates and procedures for the information to be included in the application for authorisation of a crypto-asset service provider and related entities, and Article 101 of Law 5193/2025 " (Government Gazette A 56/2025).

Article 2

Definitions

1. Crypto-asset service provider (CASP): the crypto-asset service provider as defined in Article 3 (1), point 15 of Regulation (EU) 2023/1114.
2. "Crypto-asset service": crypto-asset service means any of the services and activities defined in point (16) of Article 3 (1) of Regulation (EU) 2023/1114, in relation to any crypto-asset.
3. Qualifying holding: 'qualifying holding' means a qualifying holding within the meaning of point 36 of Article 3(1) of Regulation (EU) No 2023/1114;
4. For the purposes hereof and the Annexes hereto, "HCMC" refers to the Hellenic Capital Market Commission, "MiCA" refers to Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets and amending Regulations (EU) 1093/2010 and (EU) 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937.

Article 3

Scope

This Decision shall apply to all undertakings subject to Article 2 hereof and subject to the supervision of the Hellenic Capital Market Commission pursuant to the relevant Articles of Law 5193/2025.

Article 4

Application Procedure for the Authorisation of a Crypto-asset Service Provider (CASP)

1. Without prejudice to Articles 62 and 63 of Regulation (EU) 2023/1114, Commission Delegated Regulation (EU) 2025/305 and Commission Implementing Regulation (EU) 2025/306, the procedure for submitting an authorisation application dossier for any of the activities in accordance with the definitions in Article 3 (1) (15) and (16) of MiCA shall also be governed by the provisions of following paragraphs.

2. A procedure for the *Initial Evaluation – Pre-audit of a proposed crypto-asset service provider (CASP)* is established as per points (a-c) of this paragraph.

a. With this procedure, the HCMC offers undertakings that intend to apply for a crypto-asset service provider (CASP) authorisation the opportunity to apply for a pre-audit procedure by having an official preliminary meeting with the HCMC, to prepare and submit the authorisation application more effectively and to enhance the mutual understanding of the provider's important operational issues. The preliminary meeting is not a substitute for the formal evaluation of the application for authorisation and the comments provided are of a general nature.

b. To be eligible for a preliminary meeting, the proposed crypto-asset service provider must meet the following conditions:

- a. have established that its activities fall within the scope of Regulation (EU) 2023/1114.
- b. be certain that they will apply for authorisation under Regulation (EU) 2023/1114 in Greece.
- c. be at a sufficiently advanced stage of preparation to allow for a meaningful dialogue on policies to comply with Regulation (EU) 2023/1114.

c. To schedule the initial evaluation, the applicant should send a request for a preliminary meeting by email to crypto@cmc.gov.gr of the Hellenic Capital Market Commission. The Hellenic Capital Market Commission shall send an invitation for a one-hour online meeting, accompanied by a list of indicative preliminary meeting questions, as per Annex I hereto. Two days before the appointed meeting, for which the HCMC duly informs the applicant, the applicant shall send a presentation with brief answers to the above questions, with the aim of facilitating the applicant's authorisation procedure.

3. The *Submission of application for authorisation - Review of the dossier by the HCMC – Decision* procedure is governed by the provisions of points (a-b) of this paragraph.

a. The applicant shall submit an application for authorisation together with a file of supporting documents, in accordance with the conditions and documents and information provided for in Article 62 of Regulation (EU) 2023/1114, in Delegated Regulation (EU) 2025/305, in Implementing Regulation (EU) 2025/306, by completing the Application Form for authorisation of a crypto-asset service provider (CASP) and the related questionnaires on the assessment of a qualifying holding set out in Annexes II and III hereto. The relevant forms are posted on the HCMC website. The application and the supporting documents dossier receive a protocol number from the competent department of the Hellenic Capital Market Commission upon submission, which must be both electronic and in physical form.

b. The HCMC shall, within five (5) working days from the submission of the application, acknowledge receipt thereof in writing, in accordance with Article 63 (1) of Regulation (EU) 2023/1114. The HCMC shall, within 25 working days of receipt of an application, assess whether that application is complete by checking that the information listed in Article 62 (2) of Regulation (EU) 2023/1114 has been submitted. Where the application is not complete, the HCMC shall inform the applicant crypto-asset service provider (CASP) and set a deadline by which the latter is to provide any missing information, in accordance with Article 63 (2) of Regulation (EU) 2023/1114; such deadline may not exceed twenty (20) days. Once the application is complete, the HCMC shall immediately inform the applicant crypto-asset service provider in accordance with Article 64 (4) of Regulation (EU) 2023/1114. The HCMC shall, within forty (40) working days of receipt of the complete application, assess the application and the authorisation dossier, adopt a fully reasoned decision granting or refusing the authorisation, and notify the applicant of such decision within five (5) working days of the date of the decision, in accordance with Article 63 (9) of Regulation (EU) 2023/1114. As for all other matters, the provisions of Article 63 of Regulation (EU) 2023/1114 shall apply.

Article 5

Final provisions

1. This decision shall take effect upon its adoption.
2. Annexes I, II and III attached to this Decision constitute an integral part hereof.
3. The provisions of this decision do not entail any expenditure for the State Budget.
4. This decision shall be published in the Government Gazette.

The Secretary

Alexandra Ninasiou

The President

The Vice President

The Second Vice-President

Vasiliki Lazarakou

Michael Fekkas

Anastassia Stamou

The members

Panagiotis Giannopoulos

Georgios Leledakis

Nikolaos Stavrianou

ANNEX I

Indicative preliminary meeting questions

1. Brief summary – background regarding the Crypto-asset Service Provider (CASP)

General information

a. Brief reference to the organizational structure, the registered office and any branches, the services offered, the intention to provide services through cross-border passporting and in which countries, any partner companies inside and outside the EU, and, finally, 2-year summary financial figures.

b. In which jurisdictions are you currently authorised to provide services? For which services or activities (including non-EEA jurisdictions and activities outside the field of crypto-assets)?

c. In which EEA jurisdictions (including Greece) can you make use of a transitional period of application of Regulation (EU) 2023/1114 as provided for in Article 143 thereof, as well as Article 125 of Law 5193/2025? (grandfathering period)

- What is the duration of the transition periods or grandfathering regime in the relevant jurisdictions?
- Do you anticipate that you may exceed any of these periods and what measures do you intend to take in this regard?

Specific questions

2. Risk-based approach

a. Size.

- Do you estimate more than 1,000,000 active users within the EU? Estimate?
- Does the last balance sheet exceed €3,000,000?
- What is the size it amounts to?
- Other factors that need attention in terms of size:

b. Structure and complexity of the Group

- A schematic presentation of the Group's structure and the operations and obligations within the Group's companies.

- Reference to the arrangements in place regarding conflict of interest between the companies on AML/CFT issues.
- Report on how the Group is governed in relation to the company under authorisation.

c. Cross-border activity

- Is the Crypto-asset Service Provider (CASP) registered in the HCMC register of providers under Law 4557/2018?
- Does the Crypto-asset Service Provider (CASP) provide services to more than 200,000 clients with cross-border service status?
- Does the Crypto-asset Service Provider (CASP) provide services in a host country where more than 100,000 clients operate, causing this country to be classified as "significant" ?
- What country is this?

d. "Systemicity" of the Crypto-asset Service Provider (CASP)

- Does the applicant Crypto-asset Service Provider provide services to other Crypto-asset Service Providers within the EU ?
- To whom and what services?

e. Combination of services in crypto-assets

- For which of the services mentioned in Article 3(1)(16) of Regulation (EU) 2023/1114 will you apply for authorisation?

(Include legal documentation as well as a brief explanation of why other services are not applicable to you.)

- Do you intend to provide services that are not regulated by Regulation (EU) 2023/1114, such as access to decentralized exchanges, use of web 3 applications, DEX aggregators?
- Have you taken measures to properly inform the public in relation to the provision of unregulated services and activities and if not what measures do you intend to take to this end?
- Do you intend to provide staking services regarding crypto-assets (*Please note the definitions given in ESMA_QA_2067/09/01/2024: "the process of immobilising crypto-assets to support the operations of proof-of-stake and proof-of-stake-like blockchain consensus mechanisms in exchange for the granting of validator privileges that can generate block rewards"*)?
- What measures are you going to take to this end?

- Is it possible that, through your company, services are provided by unauthorised third country providers that belong to the same group as your company with an intended admission to trading?
- If yes, which services are these and which entities?
- In this case, do you commit to adopt a policy that protects the interests of clients, optimise their benefit, eliminate potential conflicts of interest, follow a best execution policy, and communicate all this to your prospective client?

f. Where services are provided simultaneously with the issuance of crypto-asset(s):

- Is your company also a crypto-asset issuer?
- If 'YES' what measures have you taken to limit conflicts of interest?

g. Outsourcing of key functions

- Are key CASP functions outsourced to third parties?
- What functions are those?
- Are said third parties countries within the EU?
- Are they part of the same group as the CASP?

h. Indicative categories of functions outsourced:

- Regulatory Compliance function (Answer YES or NO).
- Risk Assessment function (Answer YES or NO).
- Key functions related to ICT systems and security protocols for cyber-attacks and other malware applications.

(If YES, fully develop your answer stating the functions, entities outsourced to and applications to be used).

- The digital wallet management architecture and model

(If YES, clearly and fully indicate the functions, entities, applications and relationship of the entities with the applicant crypto-asset service provider).

- Clearly and fully indicate other functions you consider key that are outsourced and to which entities they are outsourced.

Is it possible that the crypto-asset service provider does not exert significant influence on the companies to which it has outsourced key functions, and as a result is unable to supervise and effectively assess the outsourced key functions? (point 5.2 of the

Supervisory Briefing Authorisation of CASPs under MiCA, 31 January 2025- ESMA75-453128700-1263 hereinafter referred to as "supervisory briefing" , based on article 73 (1a) of Regulation (EU) 2023/1114).

i. As for the countries where the companies to which the crypto-asset service provider has outsourced key functions operate:

- Are there any obstacles as regards the institutional framework of these countries preventing the effective supervision of these functions by the HCMC? (point 5.2 supervisory briefing)
- If YES, please indicate such cases.
- Do the companies to which key functions are outsourced in turn outsource these functions to other parties (Sub-outsourcing)?

3. Form - Organisation - Governance

a. General information on the Group, staff and registered office:

- What is your company's registered office address?
- Which legal entities are involved at Group level? What are their relationships and responsibilities?
- Please provide a table with the Group's composition and the activities per company.
- How many full-time employees are employed in total in the Group (and how are they broken down by company)?
- What is your (anticipated) presence in Greece (offices, exact number of employees, full-time employees)
- Do you consider the staff sufficient for business to be conducted normally?
- Please provide an organisational chart of staff activities/ responsibilities in Greece.

b. Regarding the members of Management.

- Which persons are subject to a fit and proper test?

(Please include all persons in charge of day-to-day operations, as well as members of the Management Board).

- What is the proposed composition of the Management Board and how is it ensured that it meets the fitness requirements?

- Is the majority of the crypto-asset service provider's Executive management board members and senior decision-making managers (executives binding the company) employed in the home country based on the principle of proportionality and its size?
- Please provide a detailed Table of senior managers by country where they are based. (4.2, Supervisory Briefing Authorisation of CASPs under MiCA, 31 January 2025- ESMA75-453128700-1263)
- If NO, is at least one Executive management board members based in Greece? (4.2, Supervisory Briefing Authorisation of CASPs under MiCA, 31 January 2025- ESMA75-453128700-1263).
- In case of smaller companies and when at least one Executive management board members is based in an EU country, can said member be present in Greece at short notice (no more than 2 days) in case of emergency?
- Is the Hellenic Capital Market Commission's ability to exercise effective oversight limited due to your company's governance structure and model?
- In particular, are there any discrepancies with regard to the institutional framework, especially where the applicant crypto-asset service provider is part of a Group operating outside the EU?

c. Degree of decision-making autonomy at management level:

- Does the executive management board have an independent Chair? (4.2, Supervisory Briefing Authorisation of CASPs under MiCA, 31 January 2025- ESMA75-453128700-1263)
- Where the above person is simultaneously the Chair of another company or companies of the Group to which the crypto-asset service provider belongs, does he/she have a distinct role and defined responsibilities as to the crypto-asset service provider in relation to the other companies in order to avoid dual hatting?
- Do the other executive management board members devote at least half of their time to your company?
- As a result of the positions they hold, could any responsibilities of the above executives at Group level get mixed up and affect the effective performance of their duties in your company?
- Do executive members act jointly or do they depend on a single member?
- Do they influence Group-level decisions about your company?
- Does the CEO devote 100% of his time to your company?
- If this is not the case, is the time spent by the CEO sufficient for the effective performance of his/her duties and the smooth operation of your company?
- Do executive management board members have sufficient knowledge of the institutional framework governing the operation of the crypto-asset service provider at national and European level? (Detailed answer)

- Do they have sufficient work experience in a subject related to the operation of the crypto-asset service provider? (Detailed answer)
- Do they have technical knowledge to meet the demanding technical level required to operate the crypto-asset service provider? (Detailed answer)

d. Internal control function

- What are your internal control mechanisms, policies, and procedures for identifying, assessing, and managing relevant risks?
- What do you think are the main risks associated with your activities?
- How many full-time employees does the company have in the internal control functions (compliance, risk management, etc.) and why do you find that this number is adequate, considering the scale and complexity of your activities?
- Is the internal audit function a part of your company or is it outsourced?
- If NO, to whom has it been outsourced?
- Is it independent in its structure, staffing and operation?
- Is it performed in conjunction with the regulatory compliance and risk assessment function?
- Do the procedures provide for distinct roles and responsibility of the executives of the internal control function?
- Are there procedures within the internal control framework for identifying, assessing and addressing cases involving money laundering or financing illegal activities?
- Does the internal control officer report to management ?
- To whom?
- Are controls regularly updated?
- How often?

e. Regulatory compliance function

- Is the compliance function performed by the crypto-asset service provider?
- If NO, to whom has it been outsourced?
- Is it independent in its structure, staffing and operation?
- Have key responsibilities been delegated, for example participation in decision-making such as the choice of cooperating with other entities, or the selection of crypto-assets in relation to which services to be provided by the crypto-asset service provider?
- Please indicate other examples.
- Is there a compliance audit plan in place for the crypto-asset service provider's sectors and activities?
- At what frequency (e.g. per year)?
- Who does the compliance officer of the crypto-asset service provider report to?

- Are specific tools or methods in place to assess the risks of non-compliance with the statutory framework, statutory provisions and policies of the crypto-asset service provider?
- Describe the procedure for reporting to the provider's competent body.

f. ICT risk management, compliance with DORA requirements

What are your plans regarding ICT risk management, and compliance with the DORA Regulation?

g. Compliance with the AML/CFT regulatory framework

What is your plan and mechanisms to comply with the AML/CFT regulatory framework?

4. Which blockchain tracking tool do you use (or plan to use) for client due diligence (CDD) and/or transaction tracking?

5. Regarding clients' ownership rights and measures to prevent their assets from being used for their own benefit.

- How do you secure clients' ownership rights over their crypto-assets and funds?
- How do you prevent use of clients' assets and funds for their own benefit (e.g. through asset segregation)?

6. Business Plan

Brief description of the CASP business plan (services, host countries, expected operation over a period of at least three years, procedures or measures for the continuation of activity in case of adverse developments, interconnection with other providers or platforms, etc.

ANNEX II

Application for authorisation as a crypto-asset service provider template

Application for authorisation as a crypto-asset service provider (CASP) in accordance with Regulation (EU) 2023/1114 (MiCA)

Reg. No.:

*[To be completed by the Hellenic Capital
Market Commission]*

Date:

By:

Name of applicant:

Address:

(Contact details of the designated contact person)

Name:

Position:

Telephone:

E-mail:

To:

The Hellenic Capital Market Commission, 3-5 Ippokratous str., 106 79 Athens

Telephone: 210-3377100

Main registry office E-mail: info@cmc.gov.gr

Dear Sir or Madam,

According to Article 2 of Commission Implementing Regulation (EU) 2025/306 of 31 October 2024 laying down implementing technical standards for application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to standard forms, templates and procedures for the information to be included in the application for authorisation of a crypto-asset service provider, please find attached the application for authorisation.

Nature of the Application (click on the corresponding box)

Authorisation (Application for authorisation)

Modification of authorisation

HCMC Directives

It is important that the applicant submits a complete, correct and quality set of documents. This will reduce the need for iterations and result in a simpler and more efficient authorisation process for both the HCMC and the applicant. The authorisation application form should contain a clear reasoning of how the applicant complies with the rules of Regulation (EU) 2023/1114 (MiCAR) and include appropriate supporting documents to substantiate its position.

The application form contains guidance on the information or accompanying documents expected from the applicant. Please use the checklist (available for download on our website) to provide information on the contents of the accompanying documents and please include an overview of the documents provided, including references to the corresponding question in the application form. Please note that the answers, as well as supporting documents, may be provided in either Greek or English.

In addition, please include an accompanying note including a letter from your company's management highlighting any points you wish to highlight.

Further remarks:

Please pay particular attention to the following:

1. To apply for an authorisation, the applicant must use this authorisation application form and provide the required accompanying documents included therein. Make sure you download the latest version of the form from the HCMC website (<http://www.hcmc.gr/>)

2. *The completed authorisation application form, together with the accompanying note, checklist and supporting documents, must be sent by email to: info@cmc.gov.gr*
3. *The HCMC will only process the authorisation application if the application form has been fully completed and legally signed on behalf of the applicant.*
4. *The HCMC reserves the right to request additional information and/or documents.*
5. *Upon submission of the application, a fee shall be payable in favour of the Hellenic Capital Market Commission in accordance with the relevant ministerial decision on the funding of the Hellenic Capital Market Commission.*
6. *If the circumstances stated in the authorisation application form, including fit & proper forms, change during the application process, the HCMC must be informed in writing without delay. Any changes must be submitted to the HCMC by email.*
7. *Accompanying documents must be clearly named that includes an accurate reference to the relevant topic and/or question, as per the example below. The HCMC cannot process documents that have not been adequately named and mentioned. In addition, please place the documents in subfolders corresponding to the question number of the application form.*
8. *Document name example:*
"Question 4_governance_procedures_Group organisational structure"
9. *Various questions require a "description". Please provide a brief but accurate description of the requested information and, optionally, specific references to the supporting documents (e.g., chapter and page number). Please note that the information in the authorisation application form is essential for the assessment, and the accompanying documents document your company's MiCA compliance. Make sure the answers provided in the form are self-explanatory. A simple reference to annexes is not considered a self-explanatory answer. In addition, if you believe that a question does not apply to your case, please indicate this explicitly and explain why.*
10. *Please ensure that you have provided all the required information to assess the suitability and reliability (i.e. fit and proper tests) of executives responsible for day-to-day operations and supervisory board members. The corresponding forms are available on our website.*
11. *When completing the authorisation application form, please consider the latest available supervisory guidance, such as ESMA's published Questions & Answers (Q&A), available on ESMA's website [=&combine_keywords_qa_search=&field_qa_level1_target_id%5B0%5D=20011&created%5Bmin%5D=&created%5Bmax%5D=](#)*

If you still have questions, please email: info@cmc.gov.gr

Applicant's signature

We (the applicants) declare that the information submitted is true, accurate, complete and not misleading. Unless explicitly stated otherwise, the information is up to date at the date of this application.

Information regarding a future date is expressly specified in the application and we undertake to notify the HCMC in writing without delay if any of this information is found to be untrue, inaccurate, incomplete or misleading. In addition, we undertake to inform the HCMC of any change in the information provided in this form.

Place

Date

Name of person responsible for day-to-day operations

Signature of person responsible for day-to-day operations

Information Required to Apply for an Authorization for a Crypto-asset Service Provider (CASP)

1. General information

An applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114 should submit to the Hellenic Capital Market Commission (hereinafter referred to for the sake of brevity as 'HCMC') an application containing all the following information:

I.	Name, telephone number, email address of applicant	
II.	Trade name or other names used or to be used by the applicant	
III.	Legal entity identifier (LEI) of the applicant and TIN	
IV.	Full name, capacity, email address and phone number of the designated contact point or person	
V.	Legal form of the applicant (including information on whether it will be a legal person or other form) and, where available, the national number (GEMI number) as well as proof of registration in the national register of companies	
VI.	The Date and Member State of the applicant's establishment or incorporation	In addition, please indicate whether you or other Group entities are also applying for a CASP authorisation in any other EU Member State. For newly established entities in Greece, please describe why you choose to be established and get authorised in Greece.
VII.	Where applicable, the Articles of Association with its amendments/instruments of incorporation and the internal rules of procedure with the relevant supporting documents. Comprehensive presentation of the statutory bodies.	Please also provide the Regulations and Provisions of the Management Board and, if applicable, of the Supervisory Board
VIII.	Address of the management head office and, if different, of the registered office or branch of the applicant.	Please provide proof of address (e.g., rental contract, lease agreement, utility bills) evidencing that the registered office exists and is used by the applicant.

IX.	<i>Information on the place of operation of branches, if any, and Legal Entity Identifiers (LEI), TIN, registered office and email, if available.</i>	
X.	<i>Domain name of each website operated by the applicant, and the applicant's social media accounts</i>	<i>The list should include used sub-domains, as well as content hosted on third-party platforms. Social media accounts include any means that facilitate interaction with clients and among clients.</i>
XI.	<i>A detailed description of any previous relevant authorisations at international level, as well as the institutional/historical evolution thereof. Where an authorisation has been revoked in the past, please state the reasons for the revocation and the measures that the applicant has adopted to ensure its lawful operation and regulatory compliance.</i>	
XII.	<i>Where the applicant intends to operate a crypto- trading platform;</i>	
	<i>i. the actual registered office, the telephone number and the email of the crypto-asset trading platform</i>	
	<i>ii. any trade name/distinctive feature of the crypto-asset trading platform</i>	
XIII.	<i>Where the applicant is not a legal person, documentation is required to assess whether the level of protection of third party interests and crypto-asset holders' rights, including in the event of bankruptcy, is equivalent to that provided by legal persons and that the applicant is subject to corresponding supervision appropriate to its legal form.</i>	

2. Programme of operations

1. An applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114 must provide the HCMC with the programme of operations for three years following the granting of the authorisation, including all of the following information:

I.	<i>Where the applicant is a member of a Group as defined in point (11) of Article 2 of Directive 2013/34/EU of the European Parliament and of the Council, please explain how the applicant's activities fit into the Group strategy and interact with the operations of the other entities in that Group, including an overview of the current and planned organisation and structure of that Group;</i>	<i>Please also provide a detailed organisational chart of the applicant's shareholding structure, including a breakdown of capital and voting rights, as well as the names of shareholders or members with substantial holdings.</i>
II.	<i>Please explain how the activities of the entities associated with the applicant, including regulated entities in the Group, are expected to affect the applicant's activities. This explanation will include a list and information about the entities affiliated with the applicant, including the locations of regulated entities, the services provided by these entities (including regulated services, operations and types of clients) and the areas of web pages operated by these entities.</i>	<i>Please include the business plan related to the crypto-asset services you (plan to) provide, including the revenue and expense model for each crypto-asset service.</i>
III.	<i>A list of the crypto-asset services that the applicant intends to provide as well as the types of crypto-assets to which the crypto-asset services relate;</i>	<i>Please provide clear arguments regarding the crypto-asset services you (intend to) provide (including legal documentation of the regulatory scope of your operations). Also include your acceptance criteria and procedures on this topic.</i>
IV.	<i>Other planned activities regulated in accordance with EU or national</i>	<i>Please indicate if you (intend to) provide (i) any staking and/or lending services; (ii) non-custodial wallets to clients;</i>

	<i>law or not regulated, including any services, other than crypto-asset services, which the applicant intends to provide;</i>	<i>(iii) services related to investment services under MiFID2 (e.g. relating to qualifying crypto-assets as financial instruments); (iv) services related to payment services under PSD2. Please be sure to clarify whether you offer derivative contracts (e.g. options, futures, swaps, forwards) of other crypto-asset - related products (e.g. products that enable leveraging). If yes, please explain how the product is settled (e.g. in cash, asset linked or digital or physical money).</i>
V.	<i>Give the number of registered users and average transaction volume on a monthly or annual basis, as well as a relevant forecast over three years</i>	
VI.	<i>If the applicant is an crypto-asset issuer, please indicate its name, the Authority that has granted the relevant authorisation or to which the authorisation application has been submitted, and indicate whether it has been included in the ESMA Register of Issuers</i>	
VII.	<i>If the applicant intends to issue crypto-assets and submit a relevant request with this application, indicate the type and function of the crypto-asset and the white paper with all the information required under Article 19 of Regulation 2023/1114</i>	
VIII.	<i>If the applicant intends to issue crypto-assets and submit a relevant request with this application, while at the same time intends to provide any of the crypto-asset services referred to in Article 3 (16) of Regulation 2023/1114, please describe the risk prevention policy in the event of a conflict of interest.</i>	
IX.	<i>State whether the applicant intends to proceed with the public offering of crypto-assets or seeks the admission of crypto-assets to</i>	

	<i>trading and, if so, which type of crypto-assets;</i>	
X.	<i>List of jurisdictions, both in the EU and in third countries, where the applicant plans to provide crypto-asset services, including information on the targeted number of clients by geographical area;</i>	<i>Please include information about the services offered inside as well as outside the European Union (EU). For non-EU jurisdictions, please specify which crypto-asset services are provided and which regulatory framework applies to these services.</i>
XI.	<i>The types of potential clients to whom the applicant's crypto-asset services are intended;</i>	<i>Please include the current and estimated number of active clients (i.e., at least one transaction in the last 12 months) that you have in an EU Member State jurisdiction.</i>
XII.	<i>Please describe the means available for clients to access the applicant's crypto-asset services, including all the following:</i>	
	<i>(i) the domain names of every website or other ICT application through which crypto-asset services will be provided by the applicant, and information on the languages in which the website or other ICT application will be available; the types of crypto-asset services that will be accessible through that website or other ICT application and, where applicable, the Member States from which the website or other ICT application will be accessible;</i>	
	<i>(ii) the name of each ICT application available to clients to access crypto-asset services, the languages in which said ICT application is available and the crypto-asset services that can be accessed through that ICT application;</i>	
XIII.	<i>The planned marketing and promotion activities and</i>	

	<i>arrangements for crypto-asset services, including:</i>	
	<i>i. all marketing media used for each of the services; the applicant's intended means of authentication; information on the relevant target client category; types of crypto-assets;</i>	
	<i>ii. languages to be used for marketing and promotion activities;</i>	
XIV.	<i>A detailed description of the human, financial and ICT resources allocated to the crypto-assets services envisaged, as well as their geographical location;</i>	
XV.	<i>The applicant's outsourcing policy and a detailed description of the applicant's planned outsourcing arrangements, including intra-group arrangements, and how the applicant will comply with Article 73 of Regulation (EU) 2023/1114; the applicant should also include information on the functions or the person in charge of outsourcing, the resources (human and IT) available to control the outsourced functions, services or activities related to the respective arrangements and the risk assessment related to outsourcing.</i>	<i>Please also provide a register of outsourcing and exit strategies.</i>
XVI.	<i>In case of outsourcing with a third party provider, please describe in detail the described supervision of the third party provider and provide cooperation contracts between the provider and the applicant, especially if the outsourced service is a key</i>	

	<i>function of the organization (CTPPs) according to JC 2025 29/15-07-2025 ESA Guide (European Supervisory Authorities)</i>	
XVII.	<i>Where outsourcing concerns the applicant's technical infrastructure or the orders handling platform, describe the applicant's rights of use and intervention, if this cannot be ascertained from the applicant's contracts with the third party provider</i>	
XVIII.	<i>Where there is already permission from an authority of another Member State (passporting), describe the framework of services to be provided in the country of origin and in the country of application</i>	
XIX.	<i>Describe how the entity operates, what system is to be used? Trading platform, broker model and with what features?</i>	
XX.	<i>In case of use of a trading platform, please describe the platform's operating features in order to comply with the provisions of art. 76 of MiCA and ESMA Guidelines 75-453128700-1048</i>	
XXI.	<i>In case of a broker model operation, please describe which functions, procedures and policies have been implemented to comply with the provisions of Article 78 of MiCA and ESMA guidelines 75-453128700-1048, and in which jurisdictions you operate.</i>	
XXII.	<i>Describe if you will be using a shared order book.</i>	

XXIII.	<i>If the answer is yes in the previous field, please describe how this will work, the procedures and relevant jurisdictions as described in document ESMA_QA_2579/20/06/2025</i>	
XXIV.	<i>Provide a list of entities to provide outsourced services, their geographical location and the related outsourced services;</i>	
XXV.	<i>Draft accounting projections including stress scenarios at individual level and, where applicable, consolidated and sub-consolidated Group level in accordance with Directive 2013/34/EU; The financial projection shall take into account any intra-group financing loans granted or to be granted by and to the applicant.</i>	
XXVI.	<i>Any exchange of crypto-assets for funds and other crypto-asset activities that the applicant intends to undertake, including through decentralized finance with which the applicant intends to interact for its own account.</i>	

2. Where applicants intend to provide the service of receiving and transmitting orders concerning crypto-assets on behalf of clients, they shall provide competent authorities with a copy of the procedures and a description of the arrangements that ensure compliance with Article 80 of Regulation (EU) 2023/1114.

3. Where applicants intend to provide the service of placing crypto-assets, they should provide the EC with a copy of the policies, procedures and a description of the arrangements in place to comply with Article 79 of Regulation (EU) 2023/1114 as well as Article 9 of [RTS on conflicts of interest of CASPs].

3. Prudential Requirements

For the purposes of Article 62 (2) (e) of Regulation (EU) 2023/1114, applicants shall provide the Hellenic Capital Market Commission with all the following information:

I.	<i>Description of the applicant's prudential safeguards provided for in Article 67 of Regulation (EU) 2023/1114, consisting of:</i>	
	<i>i. The amount of prudential safeguards at the time of application for authorisation and the description of the assumptions used to calculate that amount;</i>	
	<i>ii. The amount of the applicant's prudential safeguards covered by own funds as referred to in Article 67 (4) (a) of Regulation (EU) 2023/1114;</i>	
	<i>iii. The amount of the applicant's prudential safeguards covered by an insurance policy as referred to in Article 67 (4) (b) of Regulation (EU) 2023/1114.</i>	
II.	<i>Calculations of provisions and plans for determining own funds, including the following:</i>	
	<i>i. Calculation of provisions of the applicant's prudential safeguards for the first 3 financial years after the authorisation is granted;</i>	
	<i>ii. Design assumptions, including stress scenarios for the provisions of point (i) and explanations of the figures;</i>	

	<i>iii. expected number and type of clients, expected volume of orders and transactions and expected volume of crypto-assets in custody.</i>	
III.	<i>For undertakings or other legal entities already active, if available, the approved financial statements of the last 3 years, if audited, by an external auditor;</i>	
IV.	<i>A description of the design and monitoring procedures of the applicant's prudential safeguards in accordance with Article 67 (1) of Regulation (EU) 2023/1114;</i>	
V.	<i>Evidence that the applicant meets the prudential safeguards set out in Article 67 of Regulation (EU) 2023/1114, including:</i>	
	<p><i>i. in relation to own funds referred to in Article 67 (4) (a) of Regulation (EU) 2023/1114:</i></p> <ul style="list-style-type: none"> <i>- documentation on how the applicant has calculated the amount of prudential safeguards in accordance with Article 67 of Regulation (EU) 2023/1114;</i> <i>- for undertakings or other legal persons that are already active and whose financial statements have not been audited, a certification by an independent auditor of the amount of the applicant's own funds.</i> <i>- for businesses in the process of incorporation, a statement issued by a credit institution certifying that the funds are deposited in the applicant's bank account.</i> 	
	<i>ii. in relation to the insurance policy or comparable guarantee referred to in Article 67 (4) (b) of Regulation (EU) 2023/1114: - the</i>	

<p><i>legal name, date and Member State of establishment or incorporation, the address of the registered office and, if different, of the head office and the contact details of the undertaking authorised to provide the insurance policy or a comparable guarantee - a copy of the signed insurance policy taken out and containing all the information required to comply with Article 67 (5) and (6) of Regulation (EU) 2023/1114, where available, or - a copy of the insurance contract containing all the information required to comply with Article 67 (5) and (6) of Regulation (EU) 2023/1114, signed by an undertaking authorised to provide insurance products in accordance with EU or national law.</i></p>	
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4. Information on governance arrangements and internal control mechanisms and conflict of interest

1. For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the HCMC with the following information on their governance arrangements and internal control mechanisms:

<p>I.</p>	<p><i>A detailed description of the applicant's organisational structure, including, where applicable, the Group and, inter alia, indicating the distribution of duties and powers and the relevant reporting lines and internal control arrangements in place, together with an organisational chart.</i></p>	<p><i>Please also describe how you intend to comply with the obligation set out in MiCAR Article 68 (5).</i></p>
<p>II.</p>	<p><i>The details of the heads of internal functions (management, supervisory and internal control</i></p>	

	<i>functions), including their location and curriculum vitae, stating the relevant education, professional training and professional experience, as well as a description of the knowledge, skills and experience required to carry out the responsibilities assigned to those heads of internal functions.</i>	
III.	<i>The policies and procedures that are sufficiently effective to ensure compliance with Regulation (EU) 2023/1114 in accordance with Article 68 (4) of said Regulation, as well as a detailed description of the arrangements in place to ensure that the relevant staff are aware of the procedures they need to follow to properly perform their duties, including a detailed description of the procedures applied for the applicant's staff to report potential or actual breaches of Regulation (EU) 2023/1114 in accordance with Article 116 of said Regulation.</i>	
IV.	<i>Policies and procedures and a detailed description of the arrangements in place to maintain adequate and orderly records of the applicant's business and internal organisation in accordance with Article 68 (9) of Regulation (EU) 2023/1114 including the applicant's record-keeping arrangements in accordance with the provisions of Commission Delegated Regulation (EU) 2025/1140 of 27 February 2025.</i>	
V.	<i>Policies and procedures and arrangements that allow the management body to assess and periodically review the</i>	

	<p><i>effectiveness of policies, arrangements and procedures put in place to comply with Chapters 2 and 3 of Title V of Regulation (EU) 2023/1114 in accordance with Article 68 (6) of that Regulation, including all of the following:</i></p>	
	<p><i>i. identify the internal control functions responsible for monitoring the policies, arrangements and procedures put in place to comply with Chapters 2 and 3 of Title V of Regulation (EU) 2023/1114, as well as their scope of responsibility and the reporting lines to the applicant's management body;</i></p>	
	<p><i>ii. indicate the frequency of the internal control functions' reporting to the applicant's management body on the effectiveness of policies, arrangements and procedures put in place to comply with Chapters 2 and 3 of Title V of Regulation (EU) 2023/1114</i></p>	
	<p><i>iii. An explanation specifying how the applicant ensures that internal control functions function independently and distinctly from the functions they control, whether internal control functions have access to the necessary resources and relevant information required, and whether such internal control functions can report directly to the applicant's management body, at least once a year and on an ad hoc basis, including when they identify a significant risk of applicant non-compliance with its obligations under Regulation (EU) 2023/1114;</i></p>	

	<i>iv. a description of the ICT systems, safeguards and controls in place to monitor the applicant's activities and to comply with Chapters 2 and 3 of Title V of Regulation (EU) 2023/1114, including back-up systems, as well as ICT systems and risk controls, when not provided in accordance with Article 9 of Commission Delegated Regulation (EU) 2025/305 of 31 October 2024.</i>	
VII.	<i>Where applicable, a description of the arrangements in place to prevent and detect market abuse in accordance with Article 92 of Regulation (EU) 2023/1114.</i>	<i>Please note that the requirements against market abuse apply to all persons professionally arranging or executing transactions (PPAETs) in crypto-assets. Please refer to the draft regulatory technical standards (RTS) on arrangements, systems and procedures for detecting and reporting suspected market abuse. Please also include a description of any warning or market monitoring software used to detect market abuse.</i>
VIII.	<i>Whether the applicant has appointed or will appoint external auditors and, if applicable, their name and contact details, if available.</i>	
IX.	<i>The accounting policies and procedures whereby the applicant will report and submit its financial data, including the start and end dates of the applicable accounting year.</i>	

2. As part of the provision of information on the policies and procedures established for successful compliance with Chapters 2 and 3 of Title V of Regulation (EU) 2023/1114, applicants shall provide the HCMC with all the following information on the management of conflicts of interest:

I.	<i>A copy of the applicant's conflicts of interest policy, together with a description of how that policy:</i>	
	<i>i. ensures that the applicant identifies, prevents and manages conflicts of interest in accordance with Article 72 (1) of Regulation (EU) 2023/1114 and makes them</i>	

	<i>public in accordance with Article 72 (2) of said Regulation;</i>	
	<i>ii. is proportionate to the scale, nature and range of the crypto-asset services that the applicant intends to provide and the other activities of the Group to which the applicant belongs;</i>	
	<i>iii. ensures that remuneration policies, procedures and arrangements do not create conflicts of interest.</i>	
II.	<i>Explain how the applicant's conflicts of interest policy ensures its necessary compliance with Commission Delegated Regulation (EU) 2025/1142 of 27 February 2025, including information on the systems and arrangements put in place by the applicant with regard to</i>	
	<i>i. monitoring, evaluating, reviewing the effectiveness of its conflicts of interest policy and remedying any inefficiencies;</i>	
	<i>ii. recording cases of conflict of interest, including information on the identification, assessment, remediation and whether the case was disclosed to the client.</i>	

5. Business continuity plan

1. For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the HCMC with a detailed description of the business continuity plan, including the measures to be taken to ensure continuity and regular in the provision of the applicant's crypto-asset services.

2. The description in paragraph 1 shall include:

(a) details demonstrating that the business continuity plan is appropriate and that arrangements have been put in place to maintain and periodically review that plan; with respect to critical or key functions supported by third party service providers, information on how business continuity is ensured when the quality of provision of those functions is reduced to an unacceptable level or when those functions are not

provided; information on how business continuity is ensured in the event of the death of a key person and, where applicable, political risks in the service provider's jurisdiction.

b) a three-year business plan, as well as a projection of required resources and means to cover own funds.

Please use this cell to provide the requested description of question 5-2.

Please also include in your business continuity plan, a scenario that takes into account situations where a (public or private) distributed ledger (DLT) related to the services offered is malfunctioning, and describe how the core CASP activities would be affected and how these impacts would be managed.

Please include the following in the provided documentation package:

- Business impact analysis and risk assessment [Article 11(5) of Regulation (EU) 2022/2554 and Articles 24-26 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework"]

- Business continuity management policy and business continuity management process [Articles 24-6 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework"]

- Disaster recovery policy and disaster recovery process [Articles 24-6 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework"].

- Support and recovery policy and support and recovery procedures (DORA article 12).

6. Detection and prevention of money laundering and terrorist financing

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the HCMC with information on their internal control mechanisms, policies and procedures in order to comply with the provisions of national law transposing Directive (EU) 2015/849 (Law 4557/2018) and the risk assessment framework for managing risks related to money laundering and terrorist financing; it shall include all of the following:

<p>I.</p>	<p>The applicant's assessment of the inherent and residual risks of money laundering and terrorist financing associated with its activities, including risks relating to:</p> <p>i) the applicant's customer base, the services provided, the distribution channels used, the geographical areas of operation.</p>	<p>Please also provide an updated anti-terrorist financing (AML) and sanctions policy, as well as a Systematic Integrity Risk Analysis (SIRA), including information on compliance with Regulation (EU) 2023/1113 (Transfer of Funds Regulation, TFR).</p>
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<p>II.</p>	<p><i>The measures implemented or to be implemented by the applicant to prevent the identified risks and comply with the applicable anti-money laundering and counter-terrorism financing requirements, including the applicant's risk assessment procedure, the policies and procedures for compliance with customer due diligence requirements, and the policies and procedures for identifying and reporting suspicious transactions or activities;</i></p>	<p><i>At least the following topics should be covered in the applicant's policies and included in the documentation package:</i></p> <ul style="list-style-type: none"> <i>- the measures taken to identify and verify the client and its Ultimate Beneficial Owners (UBOs);</i> <i>- the measures taken to determine whether the client or their UBO are politically exposed persons (PEP);</i> <i>- the measures taken to determine whether the natural person representing the client is duly authorised, and to identify that person and verify his or her identity;</i> <i>- the measures taken to determine the purpose and planned nature of the business relationship;</i> <i>- the measures in place to determine whether the simplified client review process is sufficient or whether an enhanced client review process is necessary;</i> <i>- if necessary, outsourcing the client review process to third parties;</i> <i>- the process of relationship and transaction monitoring, if necessary, by reviewing the source of the money used in the relationship or for transactions;</i> <i>- the process of reporting suspicious transactions or activities;</i> <i>- the measures in place for training employees and day-to-day policies;</i> <i>- the measures in place to record, archive and maintain relevant information and documents;</i> <i>- the measures in place to avoid taking action in violation of sanction regulations.</i>
<p>III.</p>	<p><i>Detailed information on how these internal control mechanisms, policies and procedures are adequate and proportionate in terms of the scale, the nature, the inherent risk of money laundering and terrorist financing, the range of crypto-asset services provided, the complexity of the business model and how these mechanisms, policies and procedures ensure compliance with Directive (EU) 2015/849 and Regulation(EU) 2023/1113.</i></p>	

IV.	<i>The identity of the person responsible for ensuring compliance with AML/CTF requirements, as well as evidence of that person's knowledge, skills and experience.</i>	
V.	<i>Arrangements, human and financial resources to ensure that the applicant's staff are appropriately trained in AML/CTF (annual indications) and in specific risks related to crypto-assets.</i>	
VI.	<i>Copy of the applicant's AML/CTF policies, procedures and systems.</i>	
VII.	<i>The frequency of the assessment of the adequacy and effectiveness of such internal control mechanisms, policies and procedures, and the person or function responsible for such assessment.</i>	
VIII.	<i>Indicate any past or current cooperation with a third country designated by the FATF as Increased Monitoring or High-Risk jurisdiction.</i>	

7. Identity and evidence of the good reputation, knowledge, skills and experience of management body members and of the fact that they devote adequate time

The CASP application shall be prepared in accordance with European legislation. The relevant suitability assessments are further completed on the basis of the national regime in force in Greece.

1. For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the HCMC with the following information on each management board member (including supervisory board members):

I.	<i>Name and surname and, if different, surname at birth</i>	
II.	<i>The place and date of birth, the address and contact details of the current place of residence and of any other place of residence in the last 10 years, the nationality or nationalities, the national identity</i>	<i>Please complete the form for potential appointments and submit a copy of your ID. Please use this cell for the following information: Other home addresses in the last ten years:</i>

	<i>number and a copy of an official identity document or equivalent;</i>	<i>Personal National Identification Number:</i>
III.	<i>Details of the position held or to be held by the member of the management body, including information on whether the position is executive or non-executive, the start date or planned start date and, where applicable, the duration of the mandate, as well as a description of the key duties and responsibilities of the member.</i>	
IV.	<i>Curriculum Vitae stating the relevant education, professional training and professional experience with the name and nature of all organisations for in the member has been employed, as well as the nature and duration of the duties performed in the positions held in the previous 10 years, highlighting in particular any activities falling within the scope of the intended position, including professional experience related to financial services, crypto-assets or other digital assets, distributed ledger technology (DLT), information technology, cybersecurity or digital innovation.</i>	<i>The submitted CVs should contain all the information as described on the left.</i>
V.	<i>Proof of the member's reputation and experience, in particular a list of referrals, including contact details and letters of recommendation;</i>	<i>The referrals should be former managers/members of management under whom the person to be assessed was employed in previous employers over the last 8 years.</i>
VI.	<i>The member's background and in particular all the following:</i>	
	<i>i. Criminal record, including criminal convictions and any associated sanction as well as information on pending criminal</i>	<i>Please complete the integrity check form.</i>

	<p><i>proceedings or investigations or sanctions (including those relating to commercial law, financial services law, money laundering and terrorist financing, fraud or professional liability), information on sanctioning procedures or sanctions, information on relevant civil and administrative cases and disciplinary measures, including disqualification from the position of company director, bankruptcy, insolvency and similar procedures, in the form of an official certificate (if and to the extent this is available from the competent Member State or third country), or any other equivalent document where such a certificate does not exist. For ongoing investigations, the information may be provided with a declaration of honour.</i></p>	<p><i>In addition, submit an extract from the criminal record (if the person to be assessed has resided outside Greece.</i></p>
	<p><i>ii. Information relating to any refusal to register, license, membership or license to carry out a trade, business or profession, or the revocation, removal or termination of such registration, license, membership or license to carry out a trade, business or profession, or any exclusion by a regulatory or governmental authority or by a professional body or association.</i></p>	
	<p><i>iii. Information about dismissal from employment or a position of trust, confidentiality relationship, or similar situation.</i></p>	
	<p><i>iv. Information on whether an authority has assessed the reputation of the individual,</i></p>	

	<p><i>including the identity of that authority, the date of the assessment and information on the outcome of that assessment. It is not required that the applicant submit such information relating to the previous assessment if the HCMC is already in possession of such information.</i></p>	
VII.	<p><i>A description of any financial and non-financial interests or relationships of the member and close relatives of that member to other members of the management body and key function holders in the same institution, the parent institution, subsidiaries and shareholders; that could create potential conflicts of interest. This description should include any financial interest, including crypto-assets, other digital assets, loans, shares, guarantees or collateral, whether granted or received, commercial relations, legal proceedings as well as whether the person has been a politically exposed person, as defined in point (9) of Article 3 of Directive (EU) 2015/849 (Article 3, note 9 of L. 4557/2018), in the last two years.</i></p>	<p><i>The description should contain all the information as listed on the left.</i></p>
VIII.	<p><i>Where a material conflict of interest is identified, a statement shall be provided on how that conflict will be mitigated or satisfactorily addressed, including a reference to the outline of the conflicts of interest policy.</i></p>	

IX.	<i>Information on the time that will be devoted to the performance of the member's functions within the applicant, including all of the following:</i>	<i>If included in the suitability table, please make sure it contains all the information as listed on the left.</i>
	i. <i>The estimated minimum time, per year and per month, that the member will devote to the performance of his/her duties to the applicant.</i>	<i>If included in the suitability table, please make sure it contains all the information as listed on the left.</i>
	ii. <i>A list of the other executive and non-executive directorships that the member holds, referring to commercial and non-commercial activities or set up for the sole purposes of managing the economic interests of the member concerned.</i>	<i>If included in the suitability table, please make sure it contains all the information as listed on the left.</i>
	iii. <i>Information on the size and complexity of the companies or organisations in which the directorships referred to in point (ii) are held, including total assets, based on the last available annual accounts, whether the company is listed and the number of employees of those companies or organisations;</i>	<i>The description should contain all the information as listed on the left.</i>
	iv. <i>List of any additional responsibilities associated with the directorships referred to in point (ii), including chairing a committee.</i>	<i>The description should contain all the information as listed on the left.</i>
	v. <i>The estimated time in days per year dedicated to each of the other directorships referred to in point (ii) and the number of meetings per year dedicated to each mandate.</i>	<i>The description should contain all the information as listed on the left.</i>

2. For the purposes of point VI. (i) and (ii) of paragraph 1, applicants shall provide the information through an official certificate, where available from the relevant Member State or third country, or through another

equivalent document, where such certificate does not exist. Official records, certificates and documents shall have been issued within 3 months before the submission of the application for authorisation. For ongoing investigations, the information may be provided with a declaration of honour.

3. The applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114 shall provide the HCMC with the results of each suitability assessment of each member of the management body performed by the applicant, as well as the results of the assessment of the management body's collective suitability, including the suitability assessment report or documents on the outcome of the suitability assessment.

Completion of the assessment form of shareholder with qualifying holding is required

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8. Information about shareholders or members with qualifying holdings

To collect the required information on shareholders or members with qualifying holdings, the applicant shall submit the information and data provided for in Commission Delegated Regulation (EU) 2025/414 of 18 December 2024 with regard to regulatory technical standards specifying the detailed content of the information necessary to carry out the assessment of a proposed acquisition of a qualifying holding in a crypto-asset service provider, as well as the information set out in Article 8 of Commission Delegated Regulation (EU) 2025/305 of 31 October 2024 with regard to regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider. The applicant shall provide the above information by completing the relevant forms set out in Annex III hereto, which shall be submitted along with the authorisation dossier, at the time of submission of the application.

9. ICT systems and related security arrangements

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the Hellenic Capital Market Commission with the following information

I.	Technical documentation of ICT systems, the DLT infrastructure on which they are based, where applicable, and the security arrangements. The applicant must include a description of the arrangements and deployed ICTs and human resources, established	Please use this cell to provide a complete answer and at least the following supporting documentation: - Information security policy and measures (Articles 2 and 3 of DORA and Article 29 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework").
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<p>to ensure that the applicant complies with Regulation (EU) 2022/2554, including, but not limited to:</p>	
<p>i. a description of how the applicant ensures a robust, comprehensive and well-documented ICT risk management framework as part of its overall risk management system, including a detailed description of the ICT systems, protocols and tools and how the applicant's processes, policies and systems to safeguard the security, integrity, availability, authenticity and confidentiality of the data comply with Regulations (EU) 2022/2554 and (EU) 2016/679</p>	<p>Please use this cell to provide a complete answer and at least the following documentation:</p> <ul style="list-style-type: none"> - - IT risk management policy (Article 3 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework") - - ICT changes management policy and procedures [Articles 16 and 17 of the regulatory technical standards "RTS on ICT risk management framework and on simplified ICT risk management framework"] - Overview of the information technology landscape. - Technical description of IT infrastructure and ICT systems.
<p>ii. identification of ICT services supporting critical or important functions, developed or maintained by the applicant, and of ICT services supporting critical or important functions provided by third party service providers; description of such contractual arrangements (identity and geographic location of providers, description of outsourced ICT activities or services with their main features, copy of contractual agreements) and how such arrangements comply with Article 73 of Regulation (EU) 2023/1114 and Chapter V of Regulation (EU) 2022/2554.</p>	<p>See also item XV in Section 2 Programme of Operations. Please use this cell to provide a complete answer and at least the following supporting documentation:</p> <ul style="list-style-type: none"> - Describe the policies and procedures related to third party ICT risks. These policies and procedures must comply with the provisions of Commission Delegated Regulation (EU) 2024/1773 of 13 March 2024 with regard to regulatory technical standards specifying the detailed content of the policy regarding contractual arrangements on the use of ICT services supporting critical or important functions provided by ICT third-party service providers; with the provisions of Commission Implementing Regulation (EU) 2024/2956 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) 2022/2554 of the European Parliament and of the Council with regard to the standard templates for the register of information; and the provisions of Commission Delegated Regulation (EU) 2025/532 of 24 March 2025 supplementing Regulation (EU) 2022/2554 of the European Parliament and of the Council with regard to regulatory technical standards specifying the elements that a financial entity has to determine and assess when subcontracting ICT services supporting critical or important functions.

	<p>iii. a description of the applicant's procedures, policies, arrangements and systems for security and incident management.</p>	<p>Please use this cell to provide a complete answer and at least the following supporting documentation:</p> <ul style="list-style-type: none"> - Incident management policy and incident management procedures (DORA, RTS on ICT risk management framework and on simplified ICT risk management framework Articles 22,23) - Access control policy (DORA, RTS on ICT risk management framework and on simplified ICT risk management framework Article 21) - Identity management policy and identity management procedures (DORA, RTS on ICT risk management framework and on simplified ICT risk management framework Article 20)
<p>II.</p>	<p>If available, a description of a cybersecurity audit carried out by an external cybersecurity auditor with sufficient experience in accordance with (DORA TLPT RTS detailing the minimum capability requirements described in DORA Level 1 Article 27) covering: the following checks or tests carried out by external independent parties/ partners :</p>	
	<p>i. organisational arrangements for cybersecurity, physical security, and the lifecycle of secure software development, in line with all of the following audit testing approaches;</p>	
	<p>ii. vulnerability assessments and controls and organisational network security assessments</p>	<p>Please use this cell to provide a complete answer and at least the following supporting documentation:</p> <ul style="list-style-type: none"> - Vulnerability and repair management procedures (DORA RTS on ICT risk management framework and on simplified ICT risk management framework Article 10).
	<p>iii. configuration reviews of ICT resources supporting critical and important functions as defined in point (22) of Article 3 of Regulation (EU) 2022/2554</p>	<p>Please use this cell to provide a complete answer and at least the following supporting documentation:</p> <ul style="list-style-type: none"> - ICT Asset Management Policy (DORA, RTS on ICT risk management framework and on simplified ICT risk management framework Article 4, 5).
	<p>iii. penetration tests of ICT resources supporting critical and</p>	

	<p><i>important functions as defined in point (17) of Article 3 of Regulation (EU) 2022/2554, in line with all of the following audit testing approaches:</i></p> <ul style="list-style-type: none"> <i>-Black box phase: the auditor has no information other than the IP addresses and URLs linked to the target being audited. This phase is generally preceded by the discovery of information and the identification of the target by searching for domain name systems (DNS) services, scanning open doors, discovering the presence of filtering equipment, etc.</i> <i>- Grey box stage: auditors know a typical user of the information system (legitimate authentication, 'standard' position, etc.). Identifiers may belong to different user profiles to control different levels of privileges;</i> <i>- White box phase: auditors have as much technical information as possible (architecture, source code, telephone contacts, identifiers, etc.) before starting their analysis, as well as access to technical contacts linked to the target</i> 	
	<p><i>v. If/when the applicant uses and/or develops smart contracts, review their cybersecurity source code</i></p>	
III.	<p><i>a description of the ICT systems audits carried out, if any, including the DLT infrastructures used and security settings</i></p>	
IV.	<p><i>a description of the relevant information referred to in points (a) and (b) in non-technical language</i></p>	
V.	<p><i>DORA (EU) 2022/2554 Regulation roadmap</i></p>	<p><i>Please provide a roadmap for your authorisation application in which you will provide information on the steps your company is taking to be DORA compliant in due course. We</i></p>

		<i>expect this roadmap to provide a clear view of when policies and procedures will be (eventually) drawn up and when they will be implemented within the business, including any intermediate steps.</i>
VI.	<i>If the applicant falls within the scope of Directive (EU) 2022/2555 (NIS II) on measures for a high common level of cybersecurity across the Union, identify measures and policies implemented to comply with the above Directive.</i>	

10. Segregation and safekeeping of clients' crypto-assets and funds

Where the applicant intends to hold crypto-assets belonging to clients or to have the means of access to such crypto-assets or client funds (other than e-money tokens), the applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114 shall provide the HCMC with a detailed description of its policies and procedures for the segregation of client crypto-assets and funds, including all of the following:

I.	<i>how the applicant ensures that:</i>	
	i. <i>clients' funds are not used for its own account;</i>	
	ii. <i>clients' crypto-assets are not used for its own account;</i>	
	iii. <i>wallets holding client crypto-assets are different from the applicant's own wallets.</i>	
II.	<i>a detailed description of the cryptographic key approval and secure storage system, (including multiple signature wallets).</i>	
III.	<i>the way in which the applicant segregates the clients' crypto-assets, inter alia from the crypto-assets of other clients, when the wallets contain crypto-assets of more than one client (omnibus accounts).</i>	

IV.	<i>a description of the procedure in place to ensure that clients' funds, other than e-money tokens, have been deposited with a central bank or credit institution by the end of the business day following the day on which the funds were received and held in an separately identifiable account from any accounts used to hold funds belonging to the applicant;</i>	<i>Please also include information about the bank accounts used, including EU bank accounts where clients' funds have been or will be deposited.</i>
V.	<i>where the applicant does not intend to deposit funds with the relevant central bank, describe the factors that the applicant considers in selecting the credit institutions to which client funds will be deposited, including the applicant's diversification policy, if any, and the frequency of reviewing the selection of the credit institutions to which client funds will be deposited.</i>	
VII.	<i>how the applicant ensures that customers are informed in clear, concise and non-technical language about the main aspects of the applicant's systems, policies and procedures to comply with Article 70 (1), (2) and (3) of Regulation (EU) 2023/1114.</i>	

2. In accordance with Article 70 (5) of Regulation (EU) 2023/1114, crypto-asset service providers that are e-money institutions or payment institutions shall only provide the information referred to in paragraph 1 of this Article in relation to the segregation of clients' crypto-assets.

11. Complaints-handling

procedures

An applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114 must provide the HCMC a detailed description of its complaints-handling procedures and policies, including all the following:

I.	<i>Information about the human and technical resources available to handle complaints.</i>	
II.	<i>Information on the person responsible for the resources allocated to complaints-handling, together with a curriculum vitae stating the relevant education, professional training and professional experience justifying the skills, knowledge and expertise to carry out the responsibilities assigned to him/her.</i>	
III.	<i>How the applicant ensures compliance with the requirements set out in Commission Delegated Regulation (EU) 2025/294 of 1 October 2024 with regard to regulatory technical standards specifying the requirements, templates and procedures for the handling of complaints by the crypto-asset service providers</i>	
IV.	<i>The information available, as well as the information provided, relating to how the applicant will inform clients or prospective clients that they can file a complaint free of charge, when such information is available on the applicant's website or on any other relevant digital device that may be used by clients to access the crypto-asset services.</i>	
V.	<i>The applicant's record-keeping arrangements in relation to complaints.</i>	
VI.	<i>The timetable provided in the applicant's complaint-handling policies and procedures for investigating, responding to and, where appropriate, taking action in response to complaints received.</i>	

VII.	<i>How the applicant will inform clients or prospective clients of the available remedies.</i>	
VIII.	<i>The key procedural steps that the applicant will take in making a decision over a complaint and how the applicant will communicate that decision to the client or prospective client who filed the complaint.</i>	

12. Operating rules of the trading platform and detection of market abuse

1. For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants shall provide the Hellenic Capital Market Commission with the following information:

I.	<i>the rules for the admission of crypto-assets to trading.</i>	
II.	<i>the approval process for admission of crypto-assets to trading, including client due diligence performed in accordance with Directive (EU) 2015/849 [L.4557/2018].</i>	
III.	<i>the list of any categories of crypto-assets that will not be admitted to trading and the reasons for such exclusion.</i>	
IV.	<i>the policies, procedures and fees for admission to trading, together with a description, where applicable, of membership, discounts and related terms.</i>	
V.	<i>the rules governing the execution of orders, including any procedures for cancelling executed orders and disclosing such information to market participants.</i>	
VI.	<i>the policies, procedures and methods applied to assess the suitability of crypto-assets in</i>	

	<i>accordance with Article 76 (2) of Regulation (EU) 2023/1114.</i>	
VII.	<i>the systems, procedures and arrangements in place to comply with Article 76 (7) of Regulation (EU) 2023/1114.</i>	
VIII.	<i>Systems, procedures and arrangements to make public any bid and ask prices, the depth of trading interests at the prices advertised for crypto-assets through their trading platforms, and the price, volume and time of transactions executed in respect of crypto-assets traded on their trading platforms, in accordance with Article 76 (9) and (10) of Regulation (EU) 2023/1114.</i>	<i>Please include relevant information if you use third-party services such as a price oracle (a service or system that provides real-time or periodic crypto-asset price data in smart contracts or applications in order to determine a price.</i>
IX.	<i>the fee structure and justification of how that structure complies with Article 76 (13) of Regulation (EU) 2023/1114.</i>	
X.	<i>the systems, procedures and arrangements in place to make available to the HCMC the data with respect to all orders or the mechanism to ensure that the HCMC has access to the order book and any other transactions system.</i>	<i>Please include clear evidence (e.g. matching table) that you have obtained and maintain at least the records included in the MiCAR RTS tables, specifying the content and format of order records for CASPs operating a crypto-asset trading platform (see tables 2 and 3 of the annex).</i>
XI.	<i>regarding the settlement of transactions:</i>	
	i. <i>whether the final settlement of transactions is initiated in the distributed ledger or outside it;</i>	
	ii. <i>the time frame within which the final settlement of crypto-asset transactions is initiated;</i>	
	iii. <i>systems and procedures for verifying the availability of funds and crypto-assets;</i>	
	iv. <i>procedures for confirming the relevant transaction details;</i>	

	<i>v. measures envisaged to mitigate settlement malfunctions;</i>	
	<i>vi. the time when the settlement is finalised and the time when the final settlement is initiated after execution of the transaction.</i>	
XII.	<i>the policies, procedures and systems in place to detect and prevent market abuse, including information on the notification to the Hellenic Capital Market Commission of potential market abuse incidents.</i>	<i>Please also include a description of any market notification or monitoring software used to detect market abuse.</i>

2. Applicants intending to operate a crypto-asset trading platform shall provide the HCMC with a copy of the trading platform's operating rules as well as any procedures and systems to detect and prevent market abuse.

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13. Custody and administration policy

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants intending to provide custody and administration of crypto-asset on their clients' behalf, shall provide the Hellenic Capital Market Commission with all the following information:

I.	<i>a description of the arrangements related to the type of custody offered to clients, a copy of the applicant's standard agreement for custody and administration of crypto-assets on behalf of clients, in accordance with Article 75 (1) of Regulation (EU) 2023/1114, and a copy of the summary of the custody policy made available to customers in accordance with Article 75 (3) of Regulation (EU) 2023/1114.</i>	
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II.	<i>the applicant's custody and administration policy, including a description of the identified sources of operational and ICT risks for the secure custody and control of crypto-assets or means of access to clients' crypto-assets, together with a description of:</i>	
	i. <i>policies and procedures, as well as a description of the arrangements for ensuring compliance with Article 75 (8) of Regulation (EU) 2023/1114;</i>	
	ii. <i>policies and procedures, as well as a description of systems and controls to manage these risks, including where the custody and administration of crypto-assets on behalf of clients is outsourced;</i>	
	iii. <i>systems-related policies and procedures to ensure the exercise of the rights attached to the crypto-assets by the clients, as well as a description of these systems;</i>	
	iv. <i>policies and procedures related to the systems that ensure the return of crypto-assets or means of access to clients, as well as their description.</i>	
III.	<i>information on how to identify crypto-assets and the means of access to clients' crypto-assets.</i>	
IV.	<i>information on arrangements to minimise the risk of loss of crypto-assets or means of access to crypto-assets.</i>	
V.	<i>where the crypto-asset service provider has outsourced the provision custody and administration of crypto-assets on behalf of clients to a third party:</i>	
	i. <i>information on the identity of each third party that provides the custody</i>	

	<i>and administration of crypto-assets, as well as on its status in accordance with Article 59 or Article 60 of Regulation (EU) 2023/1114;</i>	
	<i>ii. a description of any duties relating to the custody and administration of crypto-assets outsourced by the crypto-asset service provider, a list of any authorised and sub-authorised persons (as applicable), and any conflicts of interest that could arise from such outsourcing;</i>	
	<i>iii. a description of how the applicant intends to supervise outsourcing or any individual outsourcing .</i>	

14. Exchange of crypto-assets for funds or other crypto-assets

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants intending to exchange crypto-assets for funds or other crypto-assets, shall provide the Hellenic Capital Market Commission with all the following information:

I.	<i>description of the commercial policy adopted in accordance with Article 77 (1) of Regulation (EU) 2023/1114</i>	
II.	<i>a description of the method for determining the price of crypto-assets that the applicant proposes to exchange for funds or other crypto-assets in accordance with Article 77 (2) of Regulation (EU) 2023/1114, including how the volume and volatility of the crypto-assets market affects the pricing mechanism.</i>	<i>Please include relevant information if you use third-party services such as a price oracle (a service or system that provides real-time or periodic crypto-asset price data in smart contracts or applications in order to determine a price.</i>

15. Order Execution Policy

An applicant seeking authorisation as a crypto-asset service provider in accordance with Article 62 of Regulation (EU) 2023/1114, and intending to provide order execution for crypto-assets on behalf of clients, shall provide the Hellenic Capital Market Commission with its execution policy, including all of the following:

I.	<i>Arrangements to ensure that the client has consented to the execution policy prior to the execution of the order.</i>	
II.	<i>a list of crypto-asset trading platforms on which the applicant will rely to execute orders, as well as the criteria for the assessment of execution venues included in the execution policy in accordance with Article 78 (6) of Regulation (EU) 2023/1114.</i>	
III.	<i>the trading platforms that the applicant intends to use for each type of crypto-asset and confirmation that the applicant will not receive any form of remuneration, discount or non-monetary benefit in exchange for directing orders to a specific crypto-asset trading platform.</i>	
IV.	<i>how execution takes into account price, cost, speed, likelihood of execution and settlement, size, nature, conditions of custody of the crypto-assets and any other relevant consideration deemed part of all the necessary measures to achieve the best possible result for the client.</i>	
V.	<i>where applicable, the arrangements for informing clients that the applicant will execute orders outside a trading platform</i>	

	<i>and how the applicant will obtain the prior express consent of its clients prior to executing such orders.</i>	
VI.	<i>how the client is warned that any specific instructions from the client may prevent the applicant from taking the necessary measures, in accordance with the arrangements established and implemented by the applicant in its execution policy, to obtain the best possible result for the execution of such orders as regards the elements covered by the specific instructions.</i>	
VII.	<i>the process of selecting trading venues, the execution strategies used, the arrangements used in the analysis of the quality of execution performed and how the applicant monitors and verifies that the best possible result for clients has been achieved.</i>	
VIII.	<i>the arrangements to prevent the misuse of any information concerning client orders by the applicant's employees.</i>	
IX.	<i>the arrangements and procedures for how the applicant will disclose to clients information about its order execution policy and notify them of any material changes to that policy.</i>	
X.	<i>the arrangements for demonstrating compliance with Article 78 of Regulation (EU) 2023/1114 to the Hellenic Capital Market Commission, at the request of the Hellenic Capital Market Commission.</i>	

16. Providing advice on crypto-assets or portfolio management of crypto-assets

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants intending to provide advice on crypto-asset or portfolio management of crypto-assets, shall provide the Hellenic Capital Market Commission with all the following information:

I.	<i>Policies and procedures and a detailed description of the arrangements put in place by the applicant to ensure compliance with Article 81 (7) of Regulation (EU) 2023/1114. This information shall include details of:</i>	
	i. <i>the mechanisms for reviewing, evaluating and effectively preserving the knowledge and expertise of natural persons giving advice about crypto-assets or managing portfolios of crypto-assets;</i>	
	ii. <i>the arrangements to ensure that natural persons involved in the provision of advice or portfolio management are aware of, understand and apply the applicant's internal policies and procedures established for the purpose of complying with Regulation (EU) 2023/1114, in particular Article 81 (1) of that Regulation, and Directive (EU) 2015/849 (Law 4557/2018);</i>	
	iii. <i>the human and financial resources planned to be made available on an annual basis by the applicant for the professional development and training of the staff providing advice on crypto-assets or portfolio management of crypto-assets.</i>	
II.	<i>mechanisms for checking, assessing and effectively preserving the necessary knowledge and expertise</i>	

<p><i>of natural persons providing advice on behalf of the applicant, on the basis of the criteria for such assessment used in national legislation, in order to carry out the suitability assessment referred to in Article 81 (1) of Regulation (EU) 2023/1114.</i></p>	
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17. Transfer services

For the purposes of Article 62 of Regulation (EU) 2023/1114, applicants intending to provide transfer services on their clients' behalf, shall provide the Hellenic Capital Market Commission with all the following information:

I.	<i>details on the types of crypto-assets for which the applicant intends to provide transfer services.</i>	
II.	<i>a detailed description of the arrangements put in place by the applicant for the purposes of complying with Article 82 of Regulation (EU) 2023/1114, including detailed information on the applicant's arrangements and on the ICT and human resources used to promptly, effectively and thoroughly address risks in the provision of crypto-asset transfer services on behalf of clients, taking into account potential operational failures and cybersecurity risks.</i>	
III.	<i>where applicable, a description of the applicant's insurance policy, including on the insurance coverage of a loss to the client's crypto-assets that may result from cybersecurity risks.</i>	
IV.	<i>arrangements ensuring that customers are adequately informed about the policies, procedures and</i>	

	<i>arrangements referred to in point (b).</i>	
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Additional information:

18. Cross-border provision of crypto-asset services (as defined in MiCAR Article 65)

Do you intend to provide crypto-asset services in EU member states other than Greece?

- Yes, then please provide the following information*
- No*

<i>I.</i>	<i>a list of the Member States in which the crypto-asset service provider intends to provide crypto-asset services</i>	
<i>II.</i>	<i>The crypto-asset services that the crypto-asset service provider intends to provide on a cross-border basis</i>	
<i>III.</i>	<i>the starting date of the intended provision of the crypto-asset services;</i>	
<i>IV.</i>	<i>a list of all other activities provided by the crypto-asset service provider not covered by MiCAR.</i>	

Please find a relevant template in excel format on the HCMC website

19. Orderly wind-down of crypto-asset services (as provided for in MiCAR Article 74)

Crypto-asset service providers that provide the services referred to in Articles 75 to 79 shall have in place a plan that is appropriate to support an orderly wind-down of their activities according to the applicable national law, including the continuity or recovery of any critical activities performed by those service providers. That plan shall demonstrate the ability of crypto-asset service providers to carry out an orderly wind-down without causing undue economic harm to their clients.

Please note that an orderly wind-down plan describes the process whereby the company is no longer viable and is forced to wind-down its operations. Scenarios where leaving the business is a strategic decision (e.g., selling the business) are not included in the wind-down planning.

We expect that at least the following elements will be included in the orderly wind-down plan:

- Organisational descriptions, financial statements and provisions*
- Clearly defined roles and responsibilities*
- Wind-down scenarios*
- Impact assessment (on consumers, counterparties, other stakeholders)*
- Operational analysis of the wind-down procedures (including an action plan on the operational procedures to be followed during the wind-down procedure)*

ANNEX III



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΕΠΙΤΡΟΠΗ ΚΕΦΑΛΑΙΑΓΟΡΑΣ
Ν.Π.Δ.Δ.

PERSONAL QUESTIONNAIRE FOR CASP BENEFICIARIES

LEGAL ENTITIES

Name:	“.....”
Capacity:	“.....”
Applicant company/CASP:	“.....”

Purpose of this form

This form should be completed by Legal Entities with a qualified holding (direct or indirect) in a Crypto-asset Service Provider under authorisation:

GENERAL INSTRUCTIONS:

1. The questionnaire shall be individually completed by all legal persons that qualify as CASP beneficiaries under the following legislative framework:

- a) Article 62 (2) (h) of Regulation (EU) 2023/1114 of the European Parliament and of the Council;
- b) Commission Delegated Regulation (EU) 2025/305 of 31.10.2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider; and
- c) Commission Delegated Regulation (EU) 2025/414 of 18.12.2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the detailed content of information necessary to carry out the assessment of a proposed acquisition of a qualifying holding in a crypto-asset service provider.

2. This questionnaire must be completed in electronic form.

3. The questions should remain unaltered and the answers must be provided below each question or in the designated field.

4. All questions applicable to each applicant should be duly completed, or, if they are not applicable, this fact should be indicated by the letters “N/A”. Incomplete applications will be returned.

5. Where there are no competent authorities to issue of certificates, please attach equivalent documents from an independent and reliable source.

6. When completing the questionnaire, information which is publicly available or has previously been disclosed to the HCMC or to another supervisory authority, should not be considered as known by the HCMC.

7. Where applicants are required to “confirm”, a (✓) or an (x) placed in the relevant box will be considered as confirmation.

8. If there is not enough space for the answer to a question, please provide that information on a separate sheet/document and refer to it in the space provided for the answer. Please ensure that any separate sheets/documents are clearly marked with the name of the applicant entity and a reference to the appropriate question.

9. The HCMC reserves the right to request additional information during the assessment process.

ARTICLE 8 OF DELEGATED REGULATION (EU) 2025/305

INFORMATION ABOUT SHAREHOLDERS OR MEMBERS WITH QUALIFYING HOLDINGS

For the purposes of Article 62 (2) (h) of Regulation (EU) 2023/1114, applicants shall provide the HCMC with all the following information:

a) a detailed organisational chart of the applicant's shareholding structure, including an analysis of its capital and voting rights, as well as the names of shareholders or members with qualifying holdings;

b) for each shareholder or member having a direct or indirect qualifying holding in the applicant, the information and documents set out in Articles 1 to 4 of Commission Delegated Regulation (EU) 2025/414, as applicable;

c) the identity of each member of the management body who will direct the applicant's business and be appointed by that shareholder or member with qualifying holdings or upon a proposal for his/her appointment;

d) for each shareholder or member having a direct or indirect qualifying holding in the applicant, information on the number and type of shares or other interests subscribed, their nominal value, any premium paid or to be paid, any liens or encumbrances, including the identity of the secured parties;

e) the information referred to in points (b), (d) and (e) of Article 6 and in Article 8 of Delegated Regulation (EU) 2025/414.

ARTICLE 1 AND 2 OF DELEGATED REGULATION 2025/414

A. GENERAL INFORMATION PROVIDED BY THE SHAREHOLDER (LEGAL PERSON) TO THE HCMC (ARTICLE 1 (2))

1.	Name of the legal person:	
2.	Trading name (if different from legal name):	
3.	Company Registration number:	
4.	Registered office address:	
5.	Address of head office (if different from registered office):	
6.	Postal address (if different from above):	
7.	Contact details of the person within the proposed acquirer to contact regarding the notification:	
8.	Telephone number:	
9.	Fax number (if available):	
10.	E-mail address:	
11.	Website address (if available) and other social media:	
12.	Group's website address (if available):	
13.	The name and contact details of the principal professional advisor, if any, used to prepare the notification	
14.	Where the legal person is registered in a national business register referred to in Article 16 of Directive (EU) 2017/1132 of the European Parliament and of the Council, the name of the register in which that legal person is registered, the registration number or equivalent means of identification in that register, and a copy of the registration certificate,	
15.	An identifier as referred to in Article 14 of Commission Delegated Regulation (EU) 2025/1140	
16.	Corporate documents or agreements governing the legal person and a summary explanation of the main legal features of the legal form of the legal person, and an up-to-date overview of its business activity;	

17.	Whether the legal person has ever been or is regulated by a competent authority in the financial services sector or other government body and the name of such competent authority or other government body;	
18.	Where the legal person is an obliged entity as referred to in Article 2 of Directive (EU) 2015/849 of the European Parliament and of the Council (Article 5 of Law 4557/2018), the applicable anti-money laundering and counter terrorist-financing policies and procedures;	
19.	A complete list of the persons that effectively direct the business of the proposed acquirer and, in respect of each such person, the name, date and place of birth, address, contact details, a copy of the official identity document, the national identification number where available, the detailed curriculum vitae stating relevant education and training, the previous professional experience, and the professional activities or other relevant functions currently performed, including professional experience in managing holdings in companies, in financial services, crypto-assets or other digital assets, DLT, information technology, cybersecurity or digital innovation, together with the information referred to in Article 2(1), points (a) to (c) of Regulation (EU) 2025/414;	
20.	The identity of all persons that are ultimate beneficial owners of the legal persons within the meaning of Article 3 (6), points (a)(i) [Article 3 point 17(a) of L. 4557/2018] or Article 3 (6), point (c), of Directive (EU) 2015/849 [Article 3 point 17 (c) of L. 4557/2018] and, in respect of each such person, the name, date and place of birth, address, contact details, and, where available, the national identification number, together with the information referred to in Article 2 (1), points (a) to (c) of Regulation (EU) 2025/414.	

B. DETAILS OF THE REPRESENTATIVE SIGNING THE QUESTIONNAIRE

1.	Full name:	
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2.	Father's full name:	
3.	Mother's full name:	
4.	Date of birth:	
5.	Place of birth:	
6.	Identification card / passport number - date of issue :	
7.	Contact details (phone, email)::	

AT THE END OF THIS DOCUMENT THERE IS AN ANNEX WITH TEMPLATES - TABLES TO BE COMPLETED FOR THE FACILITATION OF ULTIMATE BENEFICIARIES OWNERS AND PERSONS WHO DIRECT THE BUSINESS OF THE CASP BENEFICIARY AND DETAILS OF EDUCATION AND PROFESSIONAL EXPERIENCE

Information disclosed under Regulation (EU) 2023/1114 (Article 62 (2))(EU) 2025/414, (EU) 2025/305

ARTICLE 3 OF DELEGATED REGULATION (EU) 2025/414

C. ADDITIONAL INFORMATION RELATING TO THE PROPOSED ACQUIRER THAT IS A LEGAL PERSON

1. a) In respect of the proposed acquirer and of any undertaking directed or controlled by the proposed acquirer over the last 10 years, a statement containing the following information:
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<p>i. subject to national legislative requirements concerning the disclosure of spent convictions, information on the absence of any criminal convictions or criminal proceedings where that person has been found against and which were not set aside;</p>	
<p>ii. information about any civil or administrative decisions concerning that person and any administrative sanctions or measures that were imposed as a consequence of a breach of laws or regulations, including disqualification as a company director, in each case which was not set aside and against which no appeal is pending or may be filed, and of criminal convictions in respect of which information shall also be provided for rulings still subject to appeal;</p>	
<p>iii. any bankruptcy, insolvency or similar procedures;</p>	
<p>iv. any pending criminal investigations or procedures including relating to precautionary measures;</p>	
<p>v. any civil, administrative investigations, enforcement proceedings, sanctions or other enforcement decisions against the person concerning matters which may reasonably be considered to be relevant to the assessment of the acquisition of the qualifying holding in the crypto-asset service provider;</p>	
<p>vi. any refusal of registration, authorisation, membership or licence to carry out trade, business or a profession;</p>	
<p>vii. any withdrawal, revocation or termination of a registration, authorisation, membership or license to carry out a trade, business or a profession;</p>	
<p>viii. any expulsion by a regulatory or government body or by a professional body or association;</p>	
<p>ix. any position of responsibility within an entity subject to any criminal conviction or civil or administrative penalty or other civil or administrative measure that is relevant for the assessment of the acquisition of the qualifying holding in the crypto-asset service provider taken by any authority or any ongoing investigation, in each case for conduct failings, including in respect of fraud, dishonesty, corruption, money laundering, terrorist financing or other financial crime or of failure to put in place adequate policies and procedures to prevent such events, held at the time when the alleged conduct occurred, together with details of such occurrences and of the involvement, if any, in them;</p>	

<p>x. any dismissal from employment or a position of trust, any removal from a fiduciary relationship, save as a result of the relationship concerned coming to an end by passage of time, and any similar situation;</p>	
<p>Where such documents exist, an official certificate or any other equivalent document, or where such documents do not exist, any reliable source of information, concerning the absence of any of the events referred to in point (a), points (i) to (v) in respect of that person; (The official records, certificates and documents must have been issued within 3 months prior to the submission of the notification)</p>	

<p>Where another supervisory authority has already assessed the person concerned, the identity of that authority, the date of that assessment and evidence of the outcome of that assessment;</p>
<p>A description of the current business activities of the person and of any undertaking which the person directs or controls;</p>
<p>A description of the current business activities of the person and of any undertaking which the person directs or controls;</p>
<p>Financial information, including credit ratings and publicly available reports on any undertakings directed or controlled by the person.</p>

B) A description of financial interests and non-financial interests or relationships of the proposed acquirer, or, where applicable, the group to which the proposed acquirer belongs, and the persons that effectively direct its business with: (i) any other current shareholder or member of the target entity; (ii) any person entitled to exercise voting rights of the target entity in any of the following cases or combination thereof:

<p>1.</p>	<p>voting rights held by a third party with whom that person has concluded an agreement that obliges them to adopt, by concerted exercise of the voting rights held by them, a lasting common policy towards the management body of the target entity concerned;</p>	
<p>2.</p>	<p>voting rights held by a third party under an agreement concluded with that person providing for the temporary transfer for consideration of the voting rights concerned;</p>	
<p>3.</p>	<p>voting rights attached to shares that are lodged as collateral with that person, provided the person or entity controls the voting rights and declares its intention of exercising those voting rights;</p>	

4.	voting rights attached to shares in which that person has the life interest;	
5.	voting rights that are held, or may be exercised as referred to in points (1) to (4) by an undertaking controlled by that person;	
6.	voting rights attached to shares deposited with that person which the person can exercise at its discretion in the absence of specific instructions from the shareholders;	
7.	voting rights held by a third party in its own name on behalf of that person;	
8.	voting rights which that person may exercise as a proxy where the person can exercise the voting rights at its discretion in the absence of specific instructions from the shareholders;	
	(iii) any politically exposed person within the meaning of Article 3, point (9), of Directive (EU) 2015/849 [Article 3 (9) of Law 4557/2018];	
	(iv) any person that is, according to national legislation, a member of the administrative, management or supervisory body, or of the senior management of the target entity;	
	(v) the target entity itself or any other member of its group;	

C) to the extent any conflict of interest arises from the relationships referred to above, proposed methods for managing such conflicts;

D) information on any other interests or activities of the proposed acquirer that may be in conflict with interests or activities of the target entity and possible solutions for managing those conflicts of interest;

E) Information on the shareholding structure of the proposed acquirer, with the identity of all shareholders exerting significant influence and their respective share of capital and voting rights including information on any shareholders agreements;

F) where the proposed acquirer is part of a group, as a subsidiary or as a parent company, a detailed organisational chart of the group structure and information on the share of capital and voting rights of shareholders with significant influence of the entities of the group and on the activities currently performed by the entities of the group;

G) where the proposed acquirer is part of a group as a subsidiary or as the parent company, information on the relationships between the financial and the non-financial entities of the group;

(h) information on the identification of any credit institution, payment institution or e-money institution, assurance, insurance or re-insurance undertaking, collective investment undertakings and their managers or investment firm within the group, and the names of the relevant supervisory authorities;

I) annual financial statements, at individual level and, where applicable, at consolidated and sub-consolidated levels, for the last 3 financial years, where the legal person has been in operation for that period, or such shorter period for which the legal person has been in operation and financial statements were prepared.

For the purposes of point B), credit operations, guarantees and security interests, whether granted or received, including relating to crypto-assets or other digital assets, shall be deemed to be part of financial interests, whereas family or close relationships shall be deemed to be part of non-financial interests.

2. ANNUAL FINANCIAL STATEMENTS

The proposed acquirer shall submit annual financial statements approved by an independent statutory auditor:

1.	Balance sheet;	
2.	profit and loss accounts or income statement;	
3.	the annual reports and financial annexes and any other documents registered with the registry or competent authority of the legal person;	
4.	where the proposed acquirer is a newly set-up legal person or entity, in the absence of any financial statements, an updated summary as close as possible to the date of notification, of the financial situation of the proposed acquirer, as well as the financial forecasts for the next 3 years, and the planning assumptions used in base case and stress scenario.	

3. HEAD OFFICE IN A THIRD COUNTRY

The proposed acquirer that is a legal person and has its head office in a third country shall provide to the HCMC all of the following information:

1. State whether the head office of the CASP Beneficiary is in a third country.		
Yes		
No		

Where the legal person is supervised by an authority of a third country in the financial services sector:	
1.1.	Present a certificate of good standing, or equivalent where not available, from such third country authority in relation to the legal person;
1.2.	where that authority issues such declarations, present the declaration that there are no obstacles or limitations to the provision of information necessary for the supervision of the target entity (where applicable);
1.3.	Provide general information about the regulatory regime of that third country as applicable to the legal person, including information on the extent to which the third country's anti-money laundering and counter-terrorist financing regime is consistent with the recommendations of the Financial Action Task Force.

4. STATEMENT OF ACCOMPANYING INFORMATION / DOCUMENTS

Information/Documents	Annex number	Submitted (X)/Not applicable (N/A)	For official use only
Document evidencing that the legal person is the CASP Beneficiary of the applicant (e.g. extract of the Register of Members).	1.		
Certificate of registration/incorporation in accordance with national legislation.	2.		
Document certifying the trading name of the legal person if this is different from the legal name (e.g. a confirmation letter from the legal person).	3.		
Document certifying the address of the registered office of the legal person.	4.		
Document certifying the registered address of the legal person's head office (if different from the address of the registered office).	5.		
Document certifying the postal address of the legal person's head office (if different from the address of the registered office or the head office).	6.		
Certificate of good standing of the legal person if such is issued in accordance with national legislation.	7.		
Curriculum vitae as per the Annex of all members of the management body and persons holding a management position.	8.		

Chart of global group structure as per paragraph B2.	9.		
Evidence of the outcome of the reputation assessment of the CASP Beneficiary or of the person holding a management position in the CASP Beneficiary, conducted by any other supervisory authority.	10.		
Extract from the criminal record from the competent authorities of the country of residence of any person holding a management position in the CASP Beneficiary and any shareholder exerting significant influence. These extracts from the criminal record must be provided from all the competent authorities of the countries in which the person resided in the last five years.	11.		
A declaration of honour in relation to any open investigations, enforcement proceedings, sanctions, or other enforcement decisions against any person holding a management position in the CASP Beneficiary and any shareholder exerting significant influence.	12.		
A declaration of honour in relation to any criminal records, criminal investigations or proceedings, relevant civil and administrative cases, or disciplinary actions, or bankruptcy, insolvency or similar procedures or any open investigations, enforcement proceedings, sanctions, or other enforcement decisions against the CASP Beneficiary.	13.		
Certificate of good standing in relation to the proposed acquirer (if such certificate is issued by the competent authority of the relevant jurisdiction).	14.		
Annual financial statements, at an individual and, where applicable, at consolidated group and sub-consolidated levels for the last three accounting periods, approved, where the financial statements are audited, by the external auditor including:	15.		
If the head office of the CASP Beneficiary is in a third country, present a certificate of good standing, or equivalent where not available, from foreign financial markets authorities in relation to the CASP Beneficiary.	16.		
If the head office of the CASP Beneficiary is in a third country, present a declaration by foreign financial markets authorities that there are no obstacles or limitations to the provision of information necessary for the supervision of the applicant.	17.		
If the CASP Beneficiary is a sovereign wealth fund, present a document on strategy containing the information set out in Article 11 (1) of Commission Delegated Regulation (EU)	18.		

2017/1946 of 11.7.2017 supplementing Directives 2004/39/EC and 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for an exhaustive list of information to be included by proposed acquirers in the notification of a proposed acquisition of a qualifying holding in an investment firm.			
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ARTICLE 4 of 2025/414

D. INFORMATION TO BE SUBMITTED BY PERSONS ACQUIRING AN INDIRECT QUALIFYING HOLDING IN THE TARGET ENTITY

Where a proposed acquirer intends to acquire, directly or indirectly, control over an existing holder of a qualifying holding in a target entity, irrespective of whether such existing holding is direct or indirect, or controls, directly or indirectly the proposed direct acquirer of a qualifying holding in a target entity, it shall submit the following:

Where the proposed acquirer is a legal person and specifically a trust, it shall provide the competent authority of the target entity with the information referred to in Article 1 (2) to (5), as applicable, Articles 3, 6 and 8, and Articles 9, 10 or 11, as applicable)

2) Where the proposed acquirer does not meet the conditions set out in paragraph 1, the proposed acquirer shall submit the information set out in paragraph 3, points (a) and (b), where the percentages of the holdings across the corporate chain, starting from the qualifying holding held directly in the target entity, multiplied per the holding in the level immediately above in the corporate chain results in a qualifying holding of 10 % or more. The multiplication shall be applied up the corporate chain for so long as the result of the multiplication is 10 % or more.

3) Where the proposed acquirer controls a natural or legal person holding a qualifying holding in accordance with paragraph 2, the proposed acquirer shall submit, if a legal person, the following: the information referred to in Article 1 (2), (3), (4) or (5), Article 3 (1) (a) (i) to (iv), Article 3 (1) (b) (iii), Article 3 (1) (f) to (i), Article 3 (2) and (3), Article 6 (a) to (f) and Article 8.

ARTICLE 6 (B), (D), (E) OF 2025/414

E. INFORMATION RELATING TO THE PROPOSED ACQUISITION

In relation to the proposed acquisition, the proposed acquirer shall provide to the HCMC of the target entity the following information:

1.	details of the proposed acquirer's intentions with respect to the proposed acquisition, including strategic investment or portfolio investment;	
2.	any action in concert with other parties, including the contribution of those other parties to the financing of the proposed acquisition, the means of participation in the financial arrangements in relation to the proposed acquisition and future organisational arrangements of the proposed acquisition;	
3.	the content of intended shareholder's agreements with other shareholders in relation to the target entity;	

ARTICLE 8 OF DELEGATED REGULATION (EU) 2025/414

F. INFORMATION RELATING TO THE FINANCING OF THE PROPOSED ACQUISITION

1. Information about the specific sources of funding for the proposed acquisition:

1.	detailed description of the activity that generated the funds and assets for the acquisition, supported by relevant documents, including financial statements, bank statements, tax statements and any other document or information providing evidence to the competent authority that no money laundering or terrorist financing is attempted through the proposed acquisition;	
2.	details on any assets, including any crypto-assets, which are to be sold to help finance the proposed acquisition, including conditions of sale, price, appraisal and details about the characteristics of those assets, including information on when, how and from whom those assets were acquired;	
3.	details on access to capital sources and financial markets including details of financial instruments to be issued;	

4.	<p>where the funds used for the acquisition of the holding have been borrowed, information on the use of borrowed funds including the name of relevant lenders and details of the facilities granted, including maturities, terms, pledges and guarantees, and information on the source of revenue to be used to repay such loans;</p> <p>Where the lender is not a credit institution or a financial institution authorised to grant credit, the proposed acquirer shall provide comprehensive information and supporting evidence on the origin of the funds borrowed including, the lender’s activity, legal form and place of residence, and any contractual clause empowering the lender to give instructions to the borrower about the qualifying holding.</p>	
5.	<p>details on the means of payment for the proposed acquisition and the network used to transfer funds other than e-money tokens;</p>	
6.	<p>details of any crypto-assets and related DLT used to acquire the holding, of any wallet, including the nature or type of wallet, whether it is custodial or non-custodial, where the crypto-assets used or exchanged into official currency to acquire the holding, or the means of access to such crypto-assets, were stored, of the crypto-asset service providers used, and of the distributed ledger addresses or accounts of the originator and of the beneficiary;</p>	
7.	<p>information on any financial arrangement with other persons that are or will be shareholders of the target entity.</p>	

2. The proposed acquirer that is a trust shall submit to the HCMC information on the method of financing the trust and resources ensuring the financial soundness of the trust to support the crypto-asset service provider.

XII. REDUCED INFORMATION REQUIREMENTS

ARTICLE 12 OF DELEGATED REGULATION (EU) 2025/414

1. Where the proposed acquirer has been assessed for the acquisition or increase in qualifying holdings by the same competent authority as that of the target entity in accordance with Article 13 of Directive 2014/65/EU of the European Parliament and of the Council or Article 32 of Regulation (EU) No

648/2012 of the European Parliament and of the Council, within the previous 2 years before the submission of the notification, that proposed acquirer shall only submit to the competent authority of the target entity the information that is specific to the proposed acquisition or the information that has changed since the previous assessment.

The proposed acquirer shall submit a signed declaration indicating the exact information referred to in this Regulation that has not been submitted, certifying that such information has not changed since the previous assessment and that it is still true, accurate and up-to-date.

2. Without prejudice to paragraph 1, where the proposed acquirer is an undertaking authorised by the same competent authority as that of the target entity, and subject to the ongoing prudential supervision of that competent authority, that proposed acquirer shall only submit the information referred to in this Regulation specific to the proposed acquisition and shall not be required to submit the information already in possession of that competent authority.

The proposed acquirer shall submit a signed declaration indicating the exact information referred to in this Regulation that has not been submitted because already in possession of that competent authority and certifying that such information is true, accurate and up-to-date.

3. For the purposes of this Article, information specific to the proposed acquisition referred to in this Regulation includes all of the following: a) where the proposed acquirer is a legal person, a trust, an AIF within the meaning of Article 4(1), point (a), of Directive 2011/61/EU, or an UCITS within the meaning of Article 1(2) of Directive 2009/65/EC, or a sovereign wealth fund:

- i) information referred to in Article 1(2), points (a) to (f);
- ii) information referred to in Article 3(1), points (a)(ii) to (a)(iv), and points (b), (c) and (d), and in Article 5 as applicable, and, where the proposed acquisition is covered by paragraph 1 of this Article, also information referred to in Article 3(2), points (a) to (d);
- iii) information referred to in Articles 6 and 7;
- iv) information referred to in Article 8; (v) information referred to in Articles 9, 10 or 11, as applicable.

A. BENEFICIAL OWNERS AND PERSONS WHO DIRECT THE BUSINESS OF THE CASP BENEFICIARY

1. List all beneficial owners of the CASP beneficiary.							
no.	Full name	Shareholding	Place and date of birth	Address	Email	Telephone number	ID card/Passport number and issuing country

2. List all the members of the management body and persons effectively directing the business of the CASP Beneficiary.							
no.	Full name	Date of birth	Place of birth	Address	Email	Telephone number	ID card/Passport number and issuing country
3. For each member of the management body and person effectively directing the business listed above, please complete the information set out in the Annex of this questionnaire.							

1. Full name:			
1. Please state any academic qualifications (education and professional training) starting with the most recent.			
Name of institution (country)	Time (MM/yyyy)		Qualification obtained
	From	To	
2. Please state any professional qualifications (e.g. membership in professional bodies).			
Type of membership	Name of professional body	Membership number (if applicable)	Registration date
3. Please state any other relevant qualifications (including any relevant training).			

4. Languages - Please state the level of proficiency for each language stated below on a scale from 1-5 (1-excellent, 5-basic).

Language	Reading	Writing	Speaking

5. Please provide details of the professional experience for any positions held within the last 10 years and any relevant employment outside the 10 years starting with the most recent employment (including current employment, participations in any boards of directors, as well as the periods of unemployment).

Name of employer	Time (MM/yyyy)		Principal activities of the employer	Position held	Nature and duration of performed functions /responsibilities ¹	Supervisory authority (if applicable)
	Start date	End date				

¹ In particular, please state any activities within the scope of the position sought in the applicant. Please provide details on all delegated powers and internal decision-making powers held and the areas of operations under your control.



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΕΠΙΤΡΟΠΗ ΚΕΦΑΛΑΙΑΓΟΡΑΣ
Ν.Π.Δ.Δ.

**QUESTIONNAIRE FOR
NATURAL PERSONS INTENDING TO ACQUIRE A QUALIFYING
HOLDING**

Full name	:	“.....”
Capacity	:	“.....”
Requesting company/crypto-asset service provider:		“.....”

[Purpose of the Form](#)

This form should be completed by natural persons with a qualified holding (direct or indirect) in a Crypto-asset Service Provider under authorisation:

ARTICLE 8 OF DELEGATED REGULATION (EU) 2025/305

INFORMATION ABOUT SHAREHOLDERS OR MEMBERS WITH QUALIFYING HOLDINGS

For the purposes of Article 62 (2) (h) of Regulation (EU) 2023/1114, applicants shall provide the HCMC with all the following information:

- a) a detailed organisational chart of the applicant's shareholding structure, including an analysis of its capital and voting rights, as well as the names of shareholders or members with qualifying holdings;
- b) for each shareholder or member having a direct or indirect qualifying holding in the applicant, the information and documents set out in Articles 1 to 4 of Commission Delegated Regulation (EU) 2025/414, as applicable;
- c) the identity of each member of the management body who will direct the applicant's business and be appointed by that shareholder or member with qualifying holdings or upon a proposal for his/her appointment;
- d) for each shareholder or member having a direct or indirect qualifying holding in the applicant, information on the number and type of shares or other interests subscribed, their nominal value, any premium paid or to be paid, any liens or encumbrances, including the identity of the secured parties;
- e) the information referred to in points (b), (d) and (e) of Article 6 and in Article 8 of Delegated Regulation (EU) 2025/414.

A. Identification of the proposed shareholder

1.	Full name:	
2.	Father's full name:	
3.	Mother's full name:	
4.	Date of birth:	
5.	Place of birth:	
6.	Nationality or nationalities :	
7.	Postal address:	

8.	Contact details (phone, email):	
9.	Countries of residence in the last 10 years:	
10.	TIN:	
11.	Personal national identification number (if any):	
12.	Identification card / passport number - date of issue:	

B. Details of the principal professional advisor (if any) used to prepare the notification

1.	Full name:	
2.	Father's full name:	
3.	Mother's full name:	
4.	Date of birth:	
5.	Place of birth:	
6.	ID card number:	
7.	Telephone:	

Information disclosed under Regulation (EU) 2023/1114 (Article 62 (2)),
(EU) 2025/414, (EU) 2025/305

C. General information on the natural person

1. Please attach a detailed curriculum vitae or equivalent document, stating the relevant education and training and any professional experience in the management of interests in companies, any managerial experience, any professional activities or other relevant tasks currently performed, as well as any previous professional experience relating to financial services, crypto-assets or other digital assets, distributed ledger technology (DLT), information technology, cybersecurity and digital innovation.
2. Please state any stake held in the last five years (even if it no longer exists) in the share capital of another company supervised by the Hellenic Capital Market Commission.
3. Please state any holding of 10% or more in the share capital of a legal person other than the company. If yes, is there a relationship (directly or through another legal or natural person) with the company?

IV. Additional information on the natural person

1. (a) In respect of the proposed acquirer and of any undertaking directed or controlled by the proposed acquirer over the last 10 years, a statement containing the following information:	
i. subject to national legislative requirements concerning the disclosure of spent convictions, information on the absence of any criminal convictions or criminal proceedings where that person has been found against and which were not set aside;	
ii. information about any civil or administrative decisions concerning that person and any administrative sanctions or measures that were imposed as a consequence of a breach of laws or regulations, including disqualification as a company director, in each case which was not set aside and against which no appeal is pending or may be filed, and of criminal convictions in respect of which information shall also be provided for rulings still subject to appeal;	
iii. any bankruptcy, insolvency or similar procedures;	
iv. any pending criminal investigations or procedures including relating to precautionary measures;	
v. any civil, administrative investigations, enforcement proceedings, sanctions or other enforcement decisions against the person concerning matters which may reasonably be considered to be relevant to the	

assessment of the acquisition of the qualifying holding in the crypto-asset service provider;	
vi. any refusal of registration, authorisation, membership or licence to carry out trade, business or a profession;	
vii. any withdrawal, revocation or termination of a registration, authorisation, membership or license to carry out a trade, business or a profession;	
viii. any expulsion by a regulatory or government body or by a professional body or association;	
ix. any position of responsibility within an entity subject to any criminal conviction or civil or administrative penalty or other civil or administrative measure that is relevant for the assessment of the acquisition of the qualifying holding in the crypto-asset service provider taken by any authority or any ongoing investigation, in each case for conduct failings, including in respect of fraud, dishonesty, corruption, money laundering, terrorist financing or other financial crime or of failure to put in place adequate policies and procedures to prevent such events, held at the time when the alleged conduct occurred, together with details of such occurrences and of the involvement, if any, in them;	
x. any dismissal from employment or a position of trust, any removal from a fiduciary relationship, save as a result of the relationship concerned coming to an end by passage of time, and any similar situation;	
(b) where such documents exist, an official certificate or any other equivalent document, or where such documents do not exist, any reliable source of information, concerning the absence of any of the events referred to in point (a), points (i) to (v) in respect of that person;	
(c) Where another supervisory authority has already assessed the person concerned, the identity of that authority, the date of that assessment and evidence of the outcome of that assessment;	
(d) information on the current financial position of the person, including details concerning sources of revenues, assets and liabilities, security interests and guarantees, whether granted or received;	
(e) A description of the current business activities of the person and of any undertaking which the person directs or controls;	
(f) Financial information, including credit ratings and publicly available reports on any undertakings directed or controlled by the person.	
For the purpose of point (1 b), the official records, certificates and documents must have been issued within 3 months prior to the submission of the notification.	

2. (a) a description of financial interests and non-financial interests or relationships of the proposed acquirer with the following natural or legal persons :	
i. Any other current shareholder or member of the target entity;	
ii. any person entitled to exercise voting rights of the target entity in any of the following cases or combination thereof:	
- Voting rights held by a third party with whom that person has concluded an agreement that obliges them to adopt, by concerted exercise of the voting rights held by them, a lasting common policy towards the management body of the target entity concerned	
- Voting rights held by a third party under an agreement concluded with that person providing for the temporary transfer for consideration of the voting rights concerned;	
- Voting rights attaching to shares which are lodged as collateral with that person, provided the person controls the voting rights and declares its intention of exercising them;	
- Voting rights attached to shares in which that person has the life interest;	
- Voting rights held, or exercisable within the meaning of the above four cases of point (2a) , by an undertaking controlled by that person;	
- Voting rights attached to shares deposited with that person which the person can exercise at its discretion in the absence of specific instructions from the shareholders;	
- Voting rights held by a third party in its own name on behalf of that person;	
- Voting rights which that person may exercise as a proxy where the person can exercise the voting rights at its discretion in the absence of specific instructions from the shareholders	
iii. Any person who is a member of its target entity's management	
iv. The target entity itself or any other member of its group.	
b) o the extent any conflict of interest arises from the relationships referred to in point (2a) above, proposed methods for managing such conflict;	

c) information on links to any politically exposed person (within the meaning of Article 3 (9) of EU Directive 2015/849)	
d) Information on any other interests or activities of the proposed acquirer that may be in conflict with those of the target entity and possible solutions for managing those conflicts of interest;	
<i>For the purposes of point (2 a), credit operations, guarantees and security interests, whether granted or received, including relating to crypto-assets or other digital assets, shall be deemed to be part of financial interests, whereas family or close relationships shall be deemed to be part of non-financial interests.</i>	

E. Information on the persons who will effectively direct the business of the target entity as a result of the proposed acquisition

1. Personal details (name of person, date-place of birth, address & contact details, ID card number, nationality).	
2. Details of the position held or to be held by the member of the management body, including information on whether the position is executive or non-executive, the start date or planned start date and, where applicable, the duration of the mandate, as well as a description of the key duties and responsibilities of the member..	
3. A detailed Curriculum Vitae stating or relevant education, professional training or professional experience with the name and nature of all organisations for in the member has been employed, as well as the nature and duration of the duties performed in the positions held in the previous 10 years, highlighting in particular any activities falling within the scope of the intended position, including professional experience related to financial services, crypto-assets or other digital assets, distributed ledger technology (DLT), information technology, cybersecurity or digital innovation. Documentation on the individual's experience, as well as a list of referrals including contact details and letters of recommendation.	
4. Information about the following:	
a. Criminal record/criminal investigations or procedures, relevant civil and administrative cases or disciplinary actions, including disqualification of a business manager or bankruptcy, insolvency or similar procedures through an official certificate or other equivalent document	

<p>b. Open investigations, enforcement proceedings, sanctions, or other executive decisions against the person, which can be provided through a declaration of honour</p>	
<p>c. Refusal of registration, approval, accession or licence to trade, business or profession or removal, revocation/termination of such registration, approval, accession or licence; or removal by a regulatory or government body, or by a professional body or association</p>	
<p>d. Dismissal from employment or a position of trust, fiduciary relationship or similar situation</p>	
<p>5. Where another supervisory authority has already assessed the person directing the undertaking, the identity of that authority and evidence of the outcome of that assessment;</p>	
<p>6. A description of financial interests and non-financial interests or relationships of the person and his or her close individuals to members of the management body and key function holders in the same institution, the parent institution and subsidiaries and shareholders;</p> <p>Where a material conflict of interest is identified, a statement of how that conflict will be mitigated or remedied, including a reference to the outline of the conflicts of interest policy;</p>	
<p>7. The estimated minimum time, per year and per month, that the person will devote to the performance of his or her functions within the target entity.</p>	
<p>8. A list of the other executive and non-executive directorships that the member holds, referring to commercial and non-commercial activities or set up for the sole purposes of managing the economic interests of the member concerned; Information on the size and complexity of the companies or organisations where the directorships referred to in point (ii) are held, including total assets, based on the last available annual accounts, whether or not the company is listed, and the number of employees of those companies or organisations; List of all additional responsibilities associated with the directorships referred to above, including chairing a committee. The estimated time in days per year dedicated to each of the other directorships and the number of meetings per year dedicated to each mandate.</p>	
<p>For the purposes of point 6, credit operations, holdings, guarantees and commitments are considered part of the financial interests, while family or close relationships are considered part of the non-financial interests.</p>	

VI. Information relating to the proposed acquisition

1. Details of the proposed purchaser's intentions with respect to the proposed acquisition, including strategic investment or portfolio investment.	
2. Description of all action taken in concert with other parties, including the contribution of those other parties to the financing of the proposed acquisition, the means of participation in the financial arrangements in relation to the proposed acquisition and future organisational arrangements of the proposed acquisition;	
3. The content of intended shareholder's agreements with other shareholders in relation to the target entity;	

VII. Information relating to the financing of the proposed acquisition

1. Details of the use of private funds, as well as the origin and availability of the funds, including any relevant documentary support to provide evidence to the competent authority that no money laundering has been attempted through the proposed acquisition.	
2. Details on the means of payment for the proposed acquisition and the network used to transfer funds other than e-money tokens;.	
3. Details on access to capital sources and financial markets including details of financial instruments to be issued.	
4. Information on the use of borrowed funds, including the name of the relevant lenders and details of the facilities granted, including maturities, terms, commitments and guarantees, as well as information on the source of revenue to be used to repay such loans and the origin of the borrowed funds, where the lender is not a supervised financial institution.	
5. Information on any financial arrangement with other persons that are or will be shareholders of the target entity.	
6. Details on any crypto-assets and related DLT used to acquire the holding, of any wallet, including the nature or type of wallet, whether it is custodial or	

<p>non-custodial, where the crypto-assets used or exchanged into official currency to acquire the holding or the means of access to such crypto-assets, were stored, of the crypto-asset service providers used, and of the distributed ledger addresses or accounts of the originator and of the beneficiary.</p>	
<p>7. Information about the assets of the proposed acquirer or target entity, including crypto-assets, which are to be sold in order to obtain funding for the proposed acquisition, as well as about the conditions of sale, including price, valuation, details about the characteristics of the assets, and information about when and how the assets were acquired.</p>	

VIII. Information to be submitted by persons acquiring an indirect qualifying holding in the target entity.

<p>1. Where a proposed acquirer intends to acquire, directly or indirectly control over an existing holder of a qualifying holding in a target entity, irrespective of whether such existing holding is direct or indirect, or controls, directly or indirectly the proposed direct acquirer of a qualifying holding in a target entity, it shall submit the information indicated in the following:</p> <ul style="list-style-type: none"> - <i>article 1 (1), Regulation EU2025/414 (Identification of the proposed shareholder);</i> - <i>article 2, Regulation EU2025/414 (C. General information on a natural person D. Additional information on a natural person)</i> - <i>article 6, Regulation EU2025/414 (F. Information relating to the proposed acquisition)</i> - <i>article 8, Regulation EU2025/414 (G. Information relating to the financing of the proposed acquisition)</i> <p>2. Where the proposed acquirer does not meet the conditions set out in paragraph 1, the proposed acquirer shall submit the information set out in paragraph 3, points (a) and (b) below, where the percentages of the holdings across the corporate chain, starting from the qualifying holding held directly in the target entity, multiplied per the holding in the level immediately above in the corporate chain results in a qualifying holding of 10 % or more. The multiplication shall be applied up the corporate chain for so long as the result of the multiplication is 10 % or more.</p> <p>3. Where the proposed acquirer is a natural person, the information indicated in the following:</p>	
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<ul style="list-style-type: none"> - <i>Article 1 (I), Regulation EU 2025/414 (Identification of the proposed shareholder)</i> - <i>Article 2 (a), (b) to (f) and (h) (C. General information on a natural person, and D . Additional information on a natural person)</i> - <i>Article 6 (a) to (f) (F. Information relating to the proposed acquisition)</i> - <i>Article 8 (H. Information relating to the financing of the proposed acquisition)</i> 	
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Reduced information requirements

1. Where the proposed acquirer has been assessed for the acquisition or increase in qualifying holdings by the same competent authority as that of the target entity in accordance with Article 13 of Directive 2014/65/EU of the European Parliament and of the Council (12) or Article 32 of Regulation (EU) No 648/2012 of the European Parliament and of the Council (15), within the previous 2 years before the submission of the notification, that proposed acquirer shall only submit to the competent authority of the target entity the information that is specific to the proposed acquisition or the information that has changed since the previous assessment.

The proposed acquirer shall submit a signed declaration indicating the exact information referred to in this Regulation that has not been submitted, certifying that such information has not changed since the previous assessment and that it is still true, accurate and up-to-date.

2. Without prejudice to paragraph 1, where the proposed acquirer is an undertaking authorised by the same competent authority as that of the target entity, and subject to the ongoing prudential supervision of that competent authority, that proposed acquirer shall only submit the information referred to in this Regulation specific to the proposed acquisition and shall not be required to submit the information already in possession of that competent authority.

The proposed acquirer shall submit a signed declaration indicating the exact information referred to in this Regulation that has not been submitted because already in possession of that competent authority and certifying that such information is true, accurate and up-to-date.

3. For the purposes of this Article, information specific to the proposed acquisition referred to in this Regulation includes all of the following: a) where the proposed acquirer is a natural person:

information referred to in Article 1(1); (ii) information referred to in Article 2(1), points (d) to (f) and Article 2(2), points (a) to (d) where the proposed acquisition is covered by paragraph 1, or information referred to in Article 2(2), points (a) to (d) where the proposed acquisition is covered by paragraph 2 of this Article;

iii) information referred to in Article 5;

iv) information referred to in Article 6;

v) information referred to in Article 8;

vi) information referred to in Articles 9, 10 or 11, as applicable.