



# Listing Policy - Blocktrade

Digital assets

[www.blocktrade.com](http://www.blocktrade.com)

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# TABLE OF CONTENTS

|   |          |
|---|----------|
| <b>1. Preliminary</b>   | <b>2</b> |
| General   | 2        |
| Definitions   | 2        |
| <b>2. Virtual currency issuer information and due diligence</b> | <b>3</b> |
| Due diligence on stakeholders                                   | 3        |
| Due diligence on business and economics                         | 3        |
| Legal and regulatory  | 3        |
| Compliance – Anti-money laundering                              | 4        |
| <b>3. Virtual currency issuer information</b>                   | <b>4</b> |
| <b>4. Minimum requirements</b>                                  | <b>5</b> |
| <b>5. Legal Disclaimer</b>                                      | <b>6</b> |
| <b>6. Appendix</b>  | <b>7</b> |



## Preliminary

Blocktrade will, as a rule, review and respond to all applications. If successful, the details of the integration timeline will be shared with you.

## General

Until the process is finished, the applicant must not disclose neither the application itself, nor the current stage in the process to any third party. All applicants will be asked to sign an NDA. Blocktrade reserves the right to disqualify such applications and terminate the process, especially if such an announcement is conducted in a misleading fashion.

Applications are processed on “first in, first out” principle. Blocktrade does not guarantee a fixed date until when a decision is taken. Account manager can be contacted in urgent cases, however it does not engage Blocktrade to any speed up the review process. Blocktrade does not review unsolicited re-applications.

Watch out for phishing attempts and/or impersonation fraud. Do not pre-transfer any funds until you have received an express confirmation through official channels. All external announcements regarding listing decisions are to be priorly approved by Blocktrade.

If selected for listing, companies will be asked to sign a listing contract. The signed contract thereof is a precondition for the listing itself.

Blocktrade reserves the right to delist a Virtual Asset on any basis withing a reasonable period and upon receipt of a termination notice. In case of a material breach by the Applicant (as defined below), Blocktrade reserves the right to delist the Virtual Asset with immediate effect upon receipt of the notice.

Blocktrade will be allowed to withdraw the delisted virtual currencies once the relevant notification and delay requirement are fulfilled.

Any questions about the listing process can be addressed to [listing@blocktrade.com](mailto:listing@blocktrade.com).

## Definitions

| Category        | Description   |
|-----------------|---|
| Account manager | means any individual authorized by Blocktrade to oversee the listing process.   |
| Applicant       | means any company that is interested in listing its Virtual Asset on <a href="http://www.blocktrade.com">www.blocktrade.com</a> and has submitted a listing application to achieve that.  |
| Due Diligence   | means a process that involves corporate structure, risk and compliance check, conducting an investigation, review, or audit to verify facts and information about the Project (as defined below).   |
| KYB             | means "Know Your Business" processes, involving collecting and verifying the identity of the company, its ownership structure, its business activities and the related natural persons (such as owners, directors...).  |
| Project         | means any project of listing of any kind of virtual asset, submitted by a listed applicant to Blocktrade.   |
| Virtual Asset   | means a digital representation of value that is not issued or guaranteed by a central bank or a public authority, is not necessarily attached to a legally established currency and does not possess a legal status of currency or money, but is accepted by natural or legal persons as a means of exchange and which can be transferred, stored and/or traded electronically, whether being a Virtual Currency, a payment token, a utility token or any type of blockchain based asset. |



## Virtual Asset issuer information and due diligence

Virtual Asset issuer must supply requested information and evidence for Blocktrade to conduct due diligence analysis.

### 1. Due diligence on stakeholders

1. The Applicant's representatives must initiate an onboarding process dedicated to Virtual Asset issuers and pass KYB procedure as a part of fit and proper examination.
2. The Applicant's stakeholders are investigated in terms of background, roles, experience, and capabilities.

### 2. Due diligence on business and economics

Business analysis of the Applicant will be performed in frames of the following topics:

- 2.1. Solid and sustainable business & financial aspects;
- 2.2. Key functions, benefits and utility resulting from holding or spending the Applicant's virtual currency;
- 2.3. Virtual Asset development roadmap;
- 2.4. Quantitative virtual Asset and network data;
- 2.5. Market size in frames of scalability and network effects;
- 2.6. Business risks and advantages;
- 2.7. Structure and transparency;
- 2.8. Funding history and use of resources;
- 2.9. Alignment with stakeholder interests;

### 3. Legal and regulatory

- 3.1. The Applicant must complete the KYB process on Blocktrade platform.
- 3.2. The Applicant must pass regulatory review process of the Virtual Asset, the issuer entity and/or the business model as a whole, during which they are asked to provide information regarding:
  - 3.2.1. Corporate structure at group level;
  - 3.2.2. Area of activity;
  - 3.2.3. UBO(s), executives and controlling people;
  - 3.2.4. Virtual Asset classification;
  - 3.2.5. Legal opinion on the Virtual Asset;
  - 3.2.6. Geographic restrictions;
  - 3.2.7. Existing and planned exchanges;
  - 3.2.8. Virtual Asset utility, governance and nature of operations;
  - 3.2.9. Business plan;
  - 3.2.10. and any other supporting document necessary to the understanding of the business model and/or serving AML purposes.



#### **4. Compliance – Anti-money laundering**

Due diligence is conducted on the Applicant's suitability with standing regulatory obligations that Blocktrade is subject to and the Applicant's own compliance procedures and regulatory information. Blocktrade will conduct regulatory compliance analysis regarding:

- 4.1. Compliance with applicable AML obligations and reporting to financial regulatory authorities;
- 4.2. Transaction monitoring (TRM or other third-party tool) and transparency;
- 4.3. Jurisdictions of applicable regulations and relevant supervising authorities;
- 4.4. Regulatory history;
- 4.5. Virtual Asset custody;
- 4.6. Virtual Asset valuation, market influence and nature of operations;
- 4.7. Any other element serving an AML purpose.

### **Virtual Asset information**

The Applicant must supply accurate Virtual Asset information, including, but not limited to:

- 1. Smart contract code and prior audits (if applicable);
- 2. Public whitepaper;
- 3. Virtual Asset economics:
  - 3.1. Maximum virtual Asset supply (if applicable)
  - 3.2. Circulating supply
  - 3.3. Virtual Asset allocations and vesting schedules;
  - 3.4. Any other requested information, necessary to understand the business model and ecosystem of the Project.
- 4. Existing legal opinions on the nature of the Virtual Asset from a law firm licensed in an EEA jurisdiction, UK or Switzerland.
- 5. ICO or Token Generating Event information:
  - 5.1. Soft cap/hard cap;
  - 5.2. Prospectus (where applicable);
  - 5.3. Any other relevant regulatory authorization or information.
- 6. Trading information:
  - 6.1. Liquidity;
  - 6.2. Market capitalization.
- 7. Development stage
- 8. Real world application:
  - 8.1. USP 's (unique selling points)
- 9. Funding methods



## Minimum requirements

The Applicant must satisfy the following minimum requirements by having:

1. Senior Management employees and staff with no criminal record, known company address, registration in the respective company register (must have an LEI), incorporated in a country with low or medium risk rating. Deviations from the mentioned requirements are possible but need separate approval through and enhanced due diligence process (contact: [listing@blocktrade.com](mailto:listing@blocktrade.com));
2. Extensive business plan, including financial statements and assessment of capital adequacy (solvency and liquidity projections) for further development;
3. Working prototype (Minimum Viable Product at least in public beta version);
4. Long-term intention to stay with the current Virtual Asset standard and blockchain;
5. Public Virtual Asset smart contract (verifiable Virtual Asset burns, lockups, limited total supply, allocation to team etc.);
6. Adequate KYC/AML processes during ICO. Such process must be compliant with terms of the ICO.

## Contact

[listing@blocktrade.com](mailto:listing@blocktrade.com) for inquiries

[Google forms](#) for applications



## Legal Disclaimer

No review or approval of plans, specifications, documentation or other information by the Applicant shall constitute a representation or warranty by Blocktrade that such plans, specifications, documentation or other information satisfy any applicable laws or other requirements or will provide for a safe and/or prudent operation, and no such review or approval shall make Blocktrade.com otherwise liable with respect thereto. The Applicant shall be solely responsible for determining whether its plans, specifications, construction and maintenance meet its needs, satisfy applicable laws and other requirements and will provide for a safe and prudent operation.

The Applicant shall provide Blocktrade with all financial and other information and data as Blocktrade reasonably believes appropriate and necessary to perform pre-listing assessment, and shall provide Blocktrade access to the principals, managers, officers, directors, employees, and professionals (including counsel, accountants, and consultants) of the Applicant.

The Applicant acknowledges that, as between the Applicant and Blocktrade, Blocktrade: (1) shall be entitled to rely without investigation upon all information that is available from public sources or supplied to it by the Applicant or any advisor of the Applicant; (2) shall not be responsible for, and need not verify, the accuracy, completeness or sufficiency of the information described in the foregoing clause (1); and (3) shall be entitled to assume that all projections made available to Blocktrade will have been prepared in good faith. The Applicant acknowledges to promptly notify Blocktrade in writing if it learns of any material inaccuracy or misstatement in, or material omission from, any information previously delivered to Blocktrade. Blocktrade shall not be responsible for any error, omission or false entry provided in the information contained in the listing application.

The information entailed in this Listing Policy, including this Legal Disclaimer, might be amended, updated or redrafted on an ongoing basis. Blocktrade shall never be liable for any misuse of the inaccurate or outdated version of this Legal Policy.



## Appendix 1

### Prohibited and restricted areas of activities

#### Prohibited Activities for listing services:

1. “Non-standard” or “non-transparent” activities – carried out through special-purpose or assimilated legal entities (e.g. special purpose vehicles) or in jurisdictions that impede transparency;
2. Bidding fee auctions, penny auctions, or any type of all-pay auction in which all participants must pay a non-refundable fee to place each small incremental bid;
3. Shell banks (banks based in countries where they have no physical presence involving decision-making and management and which are typically not connected to wider regulated financial groups);
4. Shell companies (a company with no physical presence involving effective decision-making, operations, or assets other than cash or equivalents of cash);
5. Bearer share corporations and companies connected to nominee or similar arrangements for the purpose of hiding or mask their true beneficial ownership;
6. Adult services – this includes physically and non-physically adult services, regardless of whether it is legal in the specific country involved;
7. Any involvement in the sale or marketing of binary options;
8. Any involvement in the sale or intermediation for weapons of war, automatic weapons, ammunitions, or defence equipment;
9. Any type of infringement of the General Terms of Blocktrade ([Term of Use | Cryptocurrency Trading App | Blocktrade](#)).

#### Restricted:

1. Any business involved with the sale of medication or drugs. These businesses must possess the appropriate licenses in the jurisdictions where they are established or sell products into.
2. Charities, social service organisations and other non-profit or political organisations. These businesses must:
  - 2.1.be registered, or local equivalent, in the country of incorporation;
  - 2.2.not be in high-risk countries, not sponsor or support any act of violence or hate.
3. Any business involved in gambling. These businesses must:
  - 3.1.be incorporated in EEA (additional countries may only be accepted with explicit approval from Blocktrade’s compliance department);
  - 3.2.only perform the following activities: online gambling, betting, poker, sport, horse racing, skill games, casino, lottery, arcade;
  - 3.3.have a relevant and valid license (as required) in all the jurisdictions where they are established or provide services to, including by means of a website in a country-specific language;
  - 3.4.be registered on the local countries gambling commission or equivalent regulatory body;
  - 3.5.be incorporated or licensed for more than five years.
4. Any business involved in import/export and cross-border logistics companies including maritime and land-based shipping. These businesses:
  - 4.1.must exercise supply chain due diligence to ensure that recipients and counterparties to a transaction are not sending or receiving commodities that may trigger sanctions;
  - 4.2.may not have activities involving prohibited countries;
  - 4.3.may not deal with prohibited goods or counterparties.





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