Reply form

**on** **the first Consultation Paper for MiCA implementation**

Responding to this paper

ESMA invites comments on all matters in this paper and in particular on the specific questions summarised in Annex 1 . Comments are most helpful if they:

* respond to the question stated;
* indicate the specific question to which the comment relates;
* contain a clear rationale; and
* describe any alternatives ESMA should consider.

ESMA will consider all comments received by **20 September 2023.**

All contributions should be submitted online at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘*Your input - Consultations’*.

Instructions

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

• Insert your responses to the questions in the Consultation Paper in this reply form.

• Please do not remove tags of the type < ESMA\_QUESTION\_MICA\_0>. Your response to each question has to be framed by the two tags corresponding to the question.

• If you do not wish to respond to a given question, please do not delete it but simply leave the text “TYPE YOUR TEXT HERE” between the tags.

• When you have drafted your responses, save the reply form according to the following convention: ESMA\_CP1\_MiCA \_nameofrespondent.

For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA\_CP1\_MiCA \_ABCD.

• Upload the Word reply form containing your responses to ESMA’s website (**pdf documents will not be considered except for annexes**). All contributions should be submitted online at *www.esma.europa.eu* under the heading *‘Your input - Consultations’.*

Publication of responses

All contributions received will be published following the close of the consultation unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA’s rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA’s Board of Appeal and the European Ombudsman.

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Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘[Data protection](https://www.esma.europa.eu/about-esma/data-protection)’.

Who should read this paper?

All interested stakeholders are invited to respond to this consultation paper. In particular, ESMA invites crypto-assets issuers, crypto-asset service providers and financial entities dealing with crypto-assets as well as all stakeholders that have an interest in crypto-assets.

# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | Kraken |
| Activity | Crypto-asset service providers |
| Are you representing an association? |  |
| Country / Region | Europe |

# Introduction

Q0: Please make your introductory comments below, if any:

<ESMA\_QUESTION\_MICA\_0>

Payward Inc (d.b.a “Kraken”) is pleased to respond to the Public Consultation on Technical Standards specifying certain requirements of the Markets in Crypto-Assets (‘MiCA’) Regulation EU 2023/1114.

Kraken remains committed to growing its business in the EU regulatory perimeter. We registered our Irish subsidiary Payward Europe Solutions Limited (‘PESL’) as a Virtual Asset Service Provider (‘VASP’) with the Italian Organismo Agenti e Mediatori (‘OAM’) in June 2022, and with the Central Bank of Ireland (‘CBI’) in April 2023. We are seeking further registrations and licences in the EU Member States as appropriate. This will include us applying for a Crypto-Asset Service Provider (‘CASP’) licence, when available.

Founded over 12 years ago, Kraken is one of the world’s oldest and largest global digital asset platforms. Kraken provides products and services to retail and institutional customers that support key components across the digital asset market value chain. Outside of the EU, Kraken holds a number of registrations, licences, authorisations and approvals including in the United States, United Kingdom, Canada, and Australia, among other developed and emerging markets.  Subject to local regulatory requirements and authorisations, Kraken’s global product and service offering includes crypto trading, investment, benchmarks, staking, banking, and others.

Kraken welcomes MiCA, as it provides legal certainty, including a clear path to licensing, and will enable the growth of our business in the EU in a manner which both protects customers and promotes confidence in the market.

# SUMMARY

* **Authorisation of CASP and notification of certain financial entities**
  + **Additional requirements on CASPs.** The proposed RTS on authorisation of crypto-asset service providers are overall well calibrated. We recommend the following with respect to the proposed provisions:
    - **Programme of operations**. Making a 3 year forward looking plan of operations a part of the application is not proportionate. It is likely to rely on insufficient data and produce misleading predictions. We recommend that this provision is either reduced (e.g. to 1 year only) or deleted.
    - **Omnibus accounts.** It should be explicitly recognised that omnibus accounts are allowed as they represent best practices existing in both traditional finance and in crypto-asset markets.
    - **Prudential requirements**:Requirements on forecast calculations and plans to determine own funds should be set to 1 year as opposed to 3 years. In addition, the market for insuring crypto companies is still relatively new and evolving so any insurance requirement should consider this.
    - **Members of the management body**: The definition of “management body” as the “board” should be confirmed and further clarifications regarding “minimum required knowledge, skill, experience and time commitment required” should be added, either in the RTS or in a Level 3 ESMA guidance.
    - **Information & Communications Technology (ICT) systems and related security arrangements**: MiCA should align with the new regulation, Digital Operational Resilience Act (‘DORA’), that will also apply to CASPs, as the highest standard.
  + **Parity of supervisory outcomes between traditional finance and crypto.** The proposed RTS on the notification by certain financial entities of their intention to provide crypto-asset services strike the right balance, aiming at a level playing field between traditional finance players and crypto-asset service providers, thereby ensuring fair competition and avoiding an unfair treatment of crypto firms.

**Complaints handling**

* **Electronic complaints.** The proposed RTS on complaints handling by crypto-asset service providers should allow CASPs to offer electronic complaints only to ensure the quality of record keeping and to ensure timely response in a remote working environment.
* **Webform for complaints.** CASPs should be explicitly allowed to turn the proposed ESMA format to a webform to ensure it is user-friendly.
* **Information required must be fit for purpose.** The information required in the complaints form should be appropriate for the type of complaint raised - e.g. in case of electronic filing, requiring a postal address from the person raising the complaints is excessive.

**Conflict of interest**

* **Methodology.** The proposed RTS on identification, prevention, management and disclosure of conflicts of interest is proportionate to the risks that occur in the crypto-assets market. Kraken welcomes the proposed methodology which addresses the conflicts better than if the RTS included a list of conflicts. Such a list could be unnecessarily narrow and exhaustive, without intention. .
* **Novel conflicts of interests.** Some conflict of interests are novel, such as where a CASP is also an issuer. This situation is not customary in traditional finance and we believe it deserves extra attention from the supervisors to preserve the integrity of the crypto-assets market.

**Acquisitions**

* **Crypto to finance acquisitions.** The proposed RTS on the proposed acquisition of a qualifying holding in a crypto-asset service provider is well calibrated and will contribute to the orderly corporate activity in the crypto-assets market. Kraken supports in particular that the RTS is forward looking and accounts for the situation where crypto-assets may be used to finance acquisitions.
* **Reduced information for repeated acquisitions.** Kraken welcomes the reduced information requirement for CASPs that have been assessed for acquisition in the previous 2 years as it reduces the burden for the NCAs while maintaining customer protection and market integrity.

We would be pleased to discuss any points or questions raised in further detail.

Beata Sivak, Head of EU Policy & Government Relations [beata.sivak@kraken.com](mailto:beata.sivak@kraken.com)

<ESMA\_QUESTION\_MICA\_0>

# Questions

Q1: Do you think that anything is missing from the draft RTS and ITS on the notification by certain financial entities to provide crypto-asset services referred to in Articles 60(13) and 60(14) of MiCA?

<ESMA\_QUESTION\_MICA\_0>

Kraken supports a level playing field between the traditional financial services firms currently licensed under their respective sectoral legislation and crypto native players when it comes to supervisory outcomes (customer protection, financial stability, market integrity). As a general remark going forward, while we support the “same risk-same regulation” principle, we call on ESMA to recognise the specificities of crypto - for example, for the next batch of RTS with regards to trading transparency where thanks to the inherent transparency in blockchain the publication of trades on crypto-asset trading platform takes place immediately after a trade has occurred.

While MiCA contains extensive requirements on CASPs under Title V, the proposed RTS specifying the information to be included in a notification by “certain financial entities of their intention to provide crypto-asset services” are in comparison lighter. We note that a traditional financial services firms’ notification will be missing: General information, Prudential requirements, Governance and controls, Fit and Proper , Information relating to shareholders or members with qualifying holdings, and Complaints handling.

We appreciate that ESMA adheres to the empowerment in the Level 1 text and assumes that where the relevant information is already available at the relevant NCA, and where the provision of crypto-asset services does not call for changes to the organisational structure and procedures of the notifying entity, the information does not have to be submitted again. Kraken agrees with this in general and in principle, as long as the supervisory outcomes remain equal.

Nevertheless, to ensure customer protection and a level playing field, ESMA needs to maintain this parity of regulation and supervision between traditional finance and crypto-asset providers. Crypto firms should not be subject to more prohibitive regulation and supervision than their traditional finance peers if providing the same service. Should such disparity emerge, ESMA could address it with the help of a Level 3 measure (Guidelines or Q&A) which would clarify the specific situation.

<ESMA\_QUESTION\_MICA\_0>

Q2: Do you agree with the list of information to be provided with an application for authorisation as a crypto-asset service provider? Please also state the reasons for your answer.:

<ESMA\_QUESTION\_MICA\_0>

As the crypto-asset market transitions to being fully regulated, it is clear that many businesses will have to significantly upscale their policies and procedures, as well as disclosures to the regulators and customers. Therefore, we welcome the proposed RTS and in particular appreciate the clarity and care with which ESMA layed out these requirements.

We note that VASP registrations in different Member States already contained information included within the CASP authorisation requirements. As long as such information has been required by the NCA during the registration/application process of a VASP such information should not be required or filed again by the applicant, as long as it was not subject to any material change.

Per the response to Q1, we support a level playing field between the traditional financial services firms  and crypto native players when it comes to supervisory outcomes (customer protection, financial stability, market integrity), while bearing in mind the specificities of crypto (e.g. inherent transparency in blockchain). However, Kraken notes that the amount of data points required of CASPs which were not listed in the L1 and which ESMA now intends to require is significant. While some are justified (e.g. disclosure of the information about the service provider’s corporate structure and its financial resources, transparency on the characteristics and extent of financial links between the entities affiliated to the providers of services related to crypto-assets etc.) others go above and beyond of what is required from traditional financial services firms under their sectoral legislations. Please see a detailed reflections below:

* **Programme of Operations**: While the inclusion of "a programme of initial operations containing information on the organisation of the CASP'' in the application is sensible, requiring that such programme of initial operations "should cover the following three years" should be either decreased to 1 year or removed entirely from the RTS since it is:
* (i) significantly adding to the scope of MiCA Level 1 text, which does to mention the 3-year horizon;
* (ii) disproportionate as the young and startup crypto companies will lack historical data on which they could run models to predict the next 3 years;
* (iii) unrealistic given the fast moving nature of the market - see the volatility in the last 3 years in the crypto markets which would deem any predictions made then not useful.
* (iv) not cognisant of the impact of regulatory change on the crypto sector given the expectations that MiCA will have a profound impact on the markets (new players/intermediaries will emerge or cease to exist, new types of assets will emerge or cease to exist) which would make any 3 year prediction nothing more than a guess; and

Instead, ESMA could monitor the developments in the crypto-asset markets and amend the RTS to include the forward plan in the future without the need of the Level 1 legislative change, after the fast moving crypto-asset market has consolidated and the sector has stabilised.

* **Segregation of clients’ crypto-assets and funds**:Kraken supports segregation of client's crypto-assets and funds - both between clients and Kraken and among individual clients. However, we would like to stress that the omnibus account structures should be permitted subject to robust controls to ensure that client assets are fully segregated from house/proprietary assets and clearly allocated to specific client accounts. This means that CASPs should maintain controls to ensure that the assets held in omnibus wallets remain dedicated towards unique customers. Maintaining omnibus wallets enhances security and operational efficiency because it reduces the number of on-chain addresses and transfers, which reduces overall security exposure (the ‘attack surface’) while also reducing operational risk. Omnibus structures can support appropriate and reliable levels of operational segregation. They are not mutually exclusive. Omnibus structures have precedent in traditional finance for similar reasons, i.e., because they increase operational efficiency while reducing operational risk.
* **Prudential requirements**:Forecast calculations and plans to determine own funds are set to three years. Being consistent with the amendments proposed regarding the initial operations forecast of the programme of operations, forecast calculations and plans to determine own funds should be set to one year. The above mentioned reasons are also valid for this amendment. The market for insuring crypto companies is still relatively new and evolving so any requirement to insure should consider this.
* **Identity and proof of good repute, knowledge, skills, experience and of sufficient time commitment of the members of the management body**: We generally support these requirements and note that they align with requirements already in place to ensure senior management are fit and proper. However, we note that who are considered members of the management body is not clearly defined. We understand this to be the company board, drawing from the traditional finance regulations and directives, but any clarification to the contrary should be detailed by ESMA.  In addition, an increased transparency around what the relevant authorities consider to be the minimum required knowledge, skill, experience and time commitment required would be welcome in order to promote common supervisory practices.
* **Information & Communications Technology (ICT) systems and related security arrangements**: MiCA requires policies and procedures which address outsourcing and business continuity. While we generally support these requirements, we would suggest an alignment with DORA as the highest standard Additionally, source code of the applicant’s used and/or developed smart-contracts should not be required to be audited for the following reasons:

(i) smart contract source code is generally available on the blockchain and can be reviewed and analysed by anyone. Furthermore, it is a common practice within the industry to publish such code on GitHub beforehand for peer review.

(ii) peer review allows for a more efficient control and audit than external audits in a fast paced environment like smart contracts as it applies state of the art knowledge of those persons that are in the forefront of innovation (peers).

(iii) publicly available code together with peer review allow also for traceability of bugs and solutions, allowing the whole ecosystem to benefit from bug fixes, as those are shared, and possible vulnerabilities.

Kraken supports an accountability approach to smart contracts, being CASPs responsible to demonstrate safe coding and code review practices, but not having to implement a specific way to review code, like external audits.

* **Detection and prevention of money laundering and terrorist financing**:

We support the provision of information on internal controls, policies and procedures which are in place to identify, assess and manage money laundering and terrorist financing risks. The information required to be provided is in line with the current requirements in this respect and should be proportionate to the scale, nature and range of crypto-assets services provided.

Additionally, ESMA should pay due attention to the fact that the policies and information regarding detection and prevention of money laundering and terrorist financing has been a cornerstone in the recent development of VASP registrations in the European Union. All information that an applicant has already shared with its competent authority during the VASP registration should be considered as part of the CASP authorisation process, so long as such information remains the same. This is of utmost importance in the case of detection and prevention of money laundering and terrorist financing as the information provided during a VASP registration is mainly focused on this point.

* **Complaints-handling**: [see the separate Qs on this topic below].
* **Information on crypto-asset services intended to be provided by the applicant**:Execution policy - We welcome the execution policy and not to impose full 'best execution' policy in the nascent crypto sector.

<ESMA\_QUESTION\_MICA\_0>

Q3: Do you agree with ESMA’s proposals on standard forms, templates and procedures for the information to be included in the application for authorisation as a crypto-asset service provider? Please also state the reasons for your answer.

<ESMA\_QUESTION\_MICA\_0>

Please see our response to Question 2.

<ESMA\_QUESTION\_MICA\_0>

Q4: Do you agree with ESMA’s proposals to specify the requirements, templates and procedures for the handling of client complaints by crypto-asset service providers? Please also state the reasons for your answer.

<ESMA\_QUESTION\_MICA\_0>

Kraken believes that an effective complaint handling process is essential to bring confidence and trust to our clients and the broader crypto market. We have support pages on our website dedicated for each service and function, as well as a live chat and call functions for 24/7 support and fast response.

As such, Kraken mainly agrees with the requirements outlined in MiCA and the proposed RTS on the requirements and procedures for the handling of client complaints by crypto-asset service providers. However, Kraken is of the view that ESMA’s pre-drafted template for complaints handling procedures (i) does not allow for a sufficiently user-friendly and efficient way of electronic complaints submission and (ii) imposes more client information requirements than fit for purpose.

1. Allow for a user friendly, dynamic and efficient way of implementation of the template electronically

Kraken understands that the template in the Annex of the RTS on complaints handling by crypto-asset service providers is a suggestion on how complaints may be filed by clients, but that neither the RTS nor Article 71 MiCA impede the CASP from designing the complaints handling procedures, especially electronically, differently, while still in accordance with all other requirements under the applicable RTS.

The template provided in the Annex is not easily adaptable electronically and offers a burdensome way of submitting complaints. It only invites the client to describe various aspects of the complaint in their own words (see section 3 of the Annex). In accordance with current industry standards, both with respect to CASPs’ existing complaints handling procedures and service providers on financial instruments and services covered by other regulatory frameworks, the forms for complaints submission are more dynamic and user friendly than what the proposed ESMA template currently offers.

The electronic form for complaints often include one or various drop-down sections where clients can choose the category of which the complaint relates (i.e. onboarding, funding, functionality of the platform, etc.), different types of problems connected to the category etc. This categorisation allows for the service provider to efficiently direct the complaint to the correct department for processing and understand the scope and nature of the complaint. In addition, clients are given support to specify what exactly the complaint is about. The client is also invited to describe or give further context to the complaint in a separate section.

The final RTS on complaints handling by crypto-asset service providers should be drafted with a minimum set of information to be included and leave the electronic implementation to CASPs’ discretion. Such discretional implementation will still require the minimum information to be included and align with ESMA’s intention to foster a common understanding and enforcement among Member States’ NCAs of the complaints handling requirements.

1. Limit the information requirement depending on the way the complaint is submitted

The template requires the client to include a comprehensive set of information such as full name, ID number, address, postcode, city and country, telephone number and email. As described under question 5, Kraken is of the view that CASPs should be able to choose whether complaints can be exclusively submitted electronically or by post or both. We suggest that if the CASP decides to only allow for complaints to be submitted electronically, complainants need only provide a minimum set of information in order to identify them: full name, email address, ID number, and country of residence. Any other details should be entered as optional only.

<ESMA\_QUESTION\_MICA\_0>

Q5: Do you think that it is useful to keep the possibility for clients of CASPs to file their complaints by post, in addition to electronic means?

<ESMA\_QUESTION\_MICA\_0>

Kraken suggests that CASPs should have discretion in choosing the way in which clients file complaints. We prefer electronic filing of complaints as opposed to filing by post, as:

* Communication between clients and CASPs, from the creation of an account to the termination of the relationship, is currently carried out electronically. A change in this process for complaints filing purposes may impose an unnecessary burden on all parties.
* The online complaint handling procedure is consistent with the usual communication methods used between CASPs and clients. This ensures that the clients expect communications from specific secured channels, thereby minimising the possibilities of scams, and serving clients in the most effective way.
* Unlike most other financial services providers, many CASPs operate with a remote-first model, and the teams in charge of complaints handling may operate from different locations.
* Allowing complaints to be submitted by post may also cause the complaints handling procedure to become less efficient with the valuable time that could be spent solving the complaint being lost in administrative procedures such as sending physical letters across borders.
* Electronic filing of complaints will facilitate record keeping.

<ESMA\_QUESTION\_MICA\_0>

Q6: Do you think that other types of specific circumstances, relationships or affiliations should be covered by Articles 1 and 2 of the draft RTS on the identification, prevention, management and disclosure of conflicts of interest by crypto-asset service providers?

<ESMA\_QUESTION\_MICA\_0>

A robust governance framework, including managing conflicts of interest, is central to Kraken’s operating model. Kraken agrees with effective disclosure of conflicts by CASPs. However, this should be proportionate to the risks of potential conflicts of interest.

Kraken supports the laid out methodology for identifying and handling conflict scenarios in the draft RTS and does not believe it is necessary to include other types of conflict of interests, as doing so could mislead into thinking that such a list could ever be exhaustive (address all possibilities) and that management of conflict of interest is a box ticking exercise.

Instead, the regulation of conflicts of interest needs to go hand in hand with CASPs' efforts to proactively address potential conflicts and disclose these efforts to supervisors in line with established principles.

This should also be complemented by (i) effective supervision by the NCAs and (ii) CASPs internal governance framework and risk management policies. Such an approach will balance the goals of protecting consumers and supporting technological growth and innovation.

Disclosure of conflicts of interest should be supervised with utmost rigour wherever there is a potential conflict at the issuer level. In the interests of broader crypto market integrity and competition, and given the potential for significant market abuse, CASPs that issue their own token should be subject to stricter requirements around managing conflicts of interest, preventing market abuse, and establishing good accounting and prudential practices.

<ESMA\_QUESTION\_MICA\_0>

Q7: Do you think that other types of specific prevention or mitigation measures should be highlighted in the minimum requirements of Article 3 of the draft RTS on the identification, prevention, management and disclosure of conflicts of interest by crypto-asset service providers?

<ESMA\_QUESTION\_MICA\_0>

Kraken believes that the measures in the draft RTS of Article 3 are appropriate and fit for purpose.

<ESMA\_QUESTION\_MICA\_0>

Q8: Do you agree with the information request laid down in Article 1 and with the granularity envisaged for the information to be provided by proposed acquirers that are trusts, AIF or UCITS management companies or sovereign wealth funds?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

Q9: Do you agree with the proportionate approach to the request of information to be submitted by proposed indirect acquirers of qualifying holdings based on whether they are identified via the control or the multiplication criterion?

<ESMA\_QUESTION\_MICA\_0>

Yes, it is important that the acquirers show sufficient knowledge or experience of the sector and technology. The acquisition or qualifying holdings requirements should be proportionate to the level of criticality of the CASP firms (e.g. a three year business plan seems disproportionate).

<ESMA\_QUESTION\_MICA\_0>

Q10: Do you consider the list of information under Article 8 complete and comprehensive to assess the financing of the acquisition, in particular as regards funding originated in the crypto ecosystem?

<ESMA\_QUESTION\_MICA\_0>

We welcome that the regulation is forward-looking and considers possibilities where crypto assets may be used to fund acquisitions. We think the list is comprehensive. There may be some potential acquirers who do not meet all the conditions of the requirements, e.g. if they are not financing their acquisition with crypto assets, therefore, some of the required fields might be N/A.

<ESMA\_QUESTION\_MICA\_0>

Q11: Do you agree with the identified cases where reduced information requirements apply and with the related requirements and safeguards?

<ESMA\_QUESTION\_MICA\_0>

We support the proportionate approach and the reduced information requirement for CASPs that have been assessed for acquisition in the previous 2 years as it reduces the burden for the NCAs while maintaining customer protection and market integrity.

<ESMA\_QUESTION\_MICA\_0>

Q12: In which EU jurisdiction(s) do you plan to be authorised to provide CASP services? In which EU jurisdiction(s) do you plan to provide CASP services under cross-border provision of crypto-asset services as specified in Article 65 of Regulation (EU) 2023/1114?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

Q13: What crypto asset services as listed in point 16 of Article 3(1) of Regulation (EU) 2023/1114 do you plan to offer (e.g. reception/transmission of orders; execution of orders on behalf of clients; operation of a trading platform etc.)? In addition, please provide some high-level explanation of the business model, including, what type of trading systems do you plan to use.

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

Q14: If you are planning to operate a trading platform:

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(a) How many white papers do you estimate to publish on you platform?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(b) What turnover, in terms of crypto-assets trading volume, do you expect to attract on your platform according to your business forecasts for the upcoming years?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(c) Do you plan to undertake transactions on the basis of an on-chain ledger or an off-chain one?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

i. In case of the former, which type of DLT are you planning to use (e.g. Ethereum, Corda, Stellar etc.)? Do you plan to store transaction data on-chain or off-chain or a mix of the two?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

ii. If the latter, how would you link on-chain and off-chain transaction data?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

Q15: If you are planning to execute/place orders on behalf of clients:

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(a) How many white papers do you estimate to offer to your clients for execution/order placement?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(b) What is the expected turnover (i.e. revenues) according to your business forecasts for the upcoming years?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(c) Do you plan to undertake transactions on the basis of an on-chain ledger or an off-chain one?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

i. In case of the former, is transaction data stored on-chain or off-chain or a mixed of the two?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

ii: If the latter, how do you link on-chain and off-chain transaction data?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

Q16: If you are planning to receive and transmit orders:

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(a) How many white papers do you estimate to offer to your clients for order transmission?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(b) What is the expected turnover (i.e. revenues) according to your business forecasts for the upcoming years?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(c) Which are the main platforms/brokers you are intending to transmit orders to?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(d) In which jurisdictions are these platforms/brokers based?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>

(e) How do you plan to keep track of the transmitted orders?

<ESMA\_QUESTION\_MICA\_0>

No comment.

<ESMA\_QUESTION\_MICA\_0>