

Treasury & Compliance Readiness Checklist

A one-page self-assessment for crypto and fintech operators. Tick what is true today — anything you can't tick is a gap worth a conversation. Built for operators, not lawyers.

Banking redundancy

- More than one banking / EMI relationship live and tested
- A named fallback if your primary account is frozen or closed
- Operating runway held outside any single institution
- A documented process to move balances within 48 hours

Custody controls

- Clear split between hot, warm and cold storage
- Multi-sig or MPC with no single point of failure
- Withdrawal whitelists and dual authorisation on large transfers
- Key-recovery and signer-loss procedures tested this year

Reconciliation

- Daily reconciliation of on-chain balances to internal ledgers
- Independent review, separate from whoever moves funds
- A break / exception log with an owner and resolution SLA
- Month-end close that ties to bank and custodian statements

MiCA / CASP readiness

- You know whether you need a CASP licence, and which class
- Minimum capital (Annex IV) and Art. 67 cover in place
- A clear route before 1 July 2026: authorise, passport-in or wind-down
- AML/CFT, governance and conduct evidence documented

DORA readiness

- ICT risk-management framework owned at board level
- Register of Information on ICT third parties maintained
- Major-incident detection and a 24-hour reporting path
- Annual resilience testing on critical systems

Board reporting

- One monthly pack covering treasury, risk and compliance
- Key risks tracked with owner and trend, not just status
- Regulatory deadlines sitting on the board calendar
- Escalation thresholds agreed in advance

Ticked fewer than 18 of 24? You have material gaps worth closing before they cost you.

Talk to HELMS · helmsadvisory.com · info@helmsadvisory.com

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