



Digital Assets Practice

plenitudeconsulting.com

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Plenitude overview

Plenitude provides market-leading Financial Crime Compliance (FCC) advisory, transformation, technology, data analytics, and managed services. We are committed to building a secure financial system, safeguarding society, and empowering our clients to meet their regulatory obligations.

Appointed to the FCA's Skilled Person Panel for Financial Crime, we enable our clients to stay ahead of emerging risks and evolving regulations by optimising systems and controls, leveraging the latest AI-powered technology and data analytics, in order to drive greater effectiveness, efficiency and sustainability, reducing the overall cost of compliance.

Our best-in-class team come from a variety of backgrounds and disciplines. This breadth and depth of industry and deep subject matter expertise, alongside our scalable, full-service offering and tech-enabled delivery, enables us to meet all of our clients' needs, inspiring confidence and delivering excellence.

We work with a broad range of retail, commercial and investment banks, insurers, asset managers, as well as payment service firms, electronic money issuers, FinTechs and crypto firms across the world, ranging from startups to global financial institutions. We have a proven delivery track record and have provided advisory and transformation services on some of the most challenging projects in the industry.

Our depth of expertise and quality of service, combined with our commercial integrity, competitive rates and innovation, is second to none. Discover more about our services and see why our integrity, passion and delivery excellence have been praised by so many clients.

Our ambition and differentiation

Our goal is clear: to be the best Financial Crime Compliance (FCC) partner in the market, trusted and admired for our expertise, our impact and the relationships that we forge. We commit to owning our clients' challenges – performing with skill, integrity and transparency to deliver solutions that bring both confidence and peace of mind.



Committed to mitigating financial crime

Exclusively dedicated to financial crime since 2012, we've worked with a broad range of financial institutions and firms across all sectors, successfully supporting in the enhancement of their control frameworks. Our success stems from our team's deep subject matter and transformation expertise, spanning all financial crime risk types, in a regulatory landscape that's constantly evolving.



S166 Panel for Financial Crime

Plenitude are appointed to the FCA's Skilled Person Panel for Financial Crime (Lot E) and are authorised to conduct skilled person reviews on behalf of the regulator. We possess a deep understanding of regulatory expectations and extensive experience in effectively assisting clients in addressing regulatory shortcomings or mitigating the risk of a Section 166 review.



Committed, agile and cost-effective

We are an agile, niche consultancy committed to client success. Free from legacy consulting models, we offer a 'need-to-have' team structure and competitive rates.



Our approach to business

Our team of specialists are experts in their fields, delivering best-in-class FCC services across the globe for total confidence and peace of mind. We maintain the highest standards of integrity – offering transparent and realistic insights on budgets, challenges and timelines from the start. We're committed to true partnership with our clients, prioritising communication and guaranteeing frequent updates on progress, budget optimisation and team deployment.



Continuous innovation and cost-effective RegTech products

We never stop innovating. Our constant improvements reflect regulatory shifts and the need to future-proof our compliance programmes. This includes incorporating AI, and developing our RegTech subscription products which enhance our consulting services and enable clients to efficiently manage financial crime obligations, country and client risk – with more solutions on the way.



Digital Assets Practice

Our Digital Assets Practice

It's not every day that you see the birth of a paradigm-shifting industry. In slightly more than a decade, the digital assets industry has skyrocketed to a market cap of over 2 trillion USD, bringing innovations poised to revolutionise monetary systems, financial services and beyond. This explosive growth brings challenges, but our expertise is your key to navigating them. Seize the opportunities digital assets offer while staying ahead of regulatory demands with our guidance.

Rapidly evolving regulatory framework

Crypto regulations must balance innovation with consumer protection, financial stability and crime prevention. We help your firm master FCC and navigate registration and licensing requirements with ease.

Diverse compliance solutions

The public nature of blockchains unlocks powerful on-chain data for compliance and risk management. This has spawned a rich vendor landscape brimming with innovative solutions – and choosing the right one is crucial. Our deep expertise will guide your firm to the best-fit solutions to raise your compliance game.

Expertise gap

Newly regulated crypto firms often struggle with creating robust control frameworks. A thorough knowledge of regulatory expectations and best practices is crucial for designing and implementing effective risk management and control systems. Let our expertise guide you to success.

Deep knowledge

We've built a powerhouse team with deep knowledge of regulatory expectations, crypto business models and associated risks. Our specialists help crypto firms master the regulatory landscape and craft robust risk management frameworks. We also collaborate with traditional finance firms, enhancing their digital asset knowledge to make informed decisions, strategise on risk management and seize emerging opportunities.



Digital Assets Practice

Our services – Digital Assets

We deliver our digital asset advisory and transformation services using proprietary toolkits and methodologies. These have been developed and tested over multiple engagements, and reflect industry regulations, guidance and best practice.



Our services for cryptoassets service providers

- Advice on regulatory obligations applicable to crypto firms, and training with regard to regulatory expectations and effective risk management
- Identification of when and how your business needs to be registered / licensed, and help with your application
- Subscription tools to assist on risk-country ratings (Compass) and client risk rating (ClientSight)
- Independent assessment or audit of your AML and crypto risk management framework



Our services for financial institutions

- Crypto training and awareness activities to all staff and/or top decision-makers
- Assessment of financial crime risks associated with the crypto business models, use cases and propositions
- Help with the development of a crypto strategy, and in conducting risk assessments to implement them
- Advice on current and emerging regulatory frameworks and how to adapt your crypto strategy to these



Our services for both

- Guidance on crypto compliance solutions and help with their selection and implementation
- Development and implementation of policies, procedures, systems and controls tailored to crypto-related activities, including risk appetite, risk assessment, monitoring and controls testing
- Programme / project management and transformation support
- Help with the preparation of regulatory reviews and support with response plans
- Due diligence on crypto issuers and cryptoasset service providers
- KYC / CDD remediation through our KYC Managed Services offering





Digital Assets Practice

Cryptoassets training and awareness

Our training equips decision-makers, business stakeholders and compliance professionals with a comprehensive grasp of the technology, business models and use cases of cryptoassets. We cover regulatory frameworks, associated risks and mitigation strategies. The structure and content are flexible, tailored to your audience, needs and learning goals.



Overview and key concepts

- History, evolution and adoption of cryptoassets
- Crypto business models (issuers, miners, crypto exchanges, wallets, custodians, etc.)
- Blockchain design, consensus mechanisms programmability (smart contracts) and governance
- Overview of cryptocurrencies including Bitcoin and privacy coins, stablecoins, other cryptoassets and Central Bank Digital Currencies



Regulatory framework

- The emerging international regulatory framework for cryptoassets
- Approach to regulation in the UK, EU, USA and other key jurisdictions
- Crypto regulatory regime in the UK, EU, HK and key considerations for crypto firms
- Regulatory obligations for TradFi firms with exposure to cryptoassets



Applications and use cases

- Smart contract platforms
- Decentralised Finance (DeFi)
- Non-Fungible Tokens (NFTs)
- Decentralised Web3 infrastructure
- Tokenisation of real-world assets



Crypto risk management

- Financial crime risks associated with cryptoassets (money laundering, terrorist financing, sanctions, fraud and cybercrime)
- How to mitigate the risks associated with cryptoassets (for both crypto and TradFi firms) and key systems and controls
- Overview of crypto compliance solutions: features, functionality and benefits (e.g. Chainalysis, TRM Labs, etc.)

Crypto compliance solutions

Managing cryptoasset risks across the customer lifecycle is crucial for regulatory compliance. While core control frameworks are similar to traditional finance, the public nature of blockchains has spawned specialist compliance solutions, such as blockchain analytics tools. These are essential for crypto activities. We've explored the vendor landscape and forged strong relationships to help you select and implement the best solutions for your business.

Exposure by risk type



Business acceptance	Onboarding and CDD/KYC	Ongoing monitoring and surveillance
Risk appetite	Customer screening	Ongoing customer screening (sanctions and PEPs)
Policies and procedures	Due diligence on customer and crypto wallets when onboarding	Detect high-risk crypto transactions
Initial customer risk rating	Determine source of funds and wealth	Trace source and destination of funds
VASP due diligence	Final customer risk rating	Ongoing customer risk rating and KYC
		Conduct transactions monitoring
		Investigate user activity
		SAR reporting

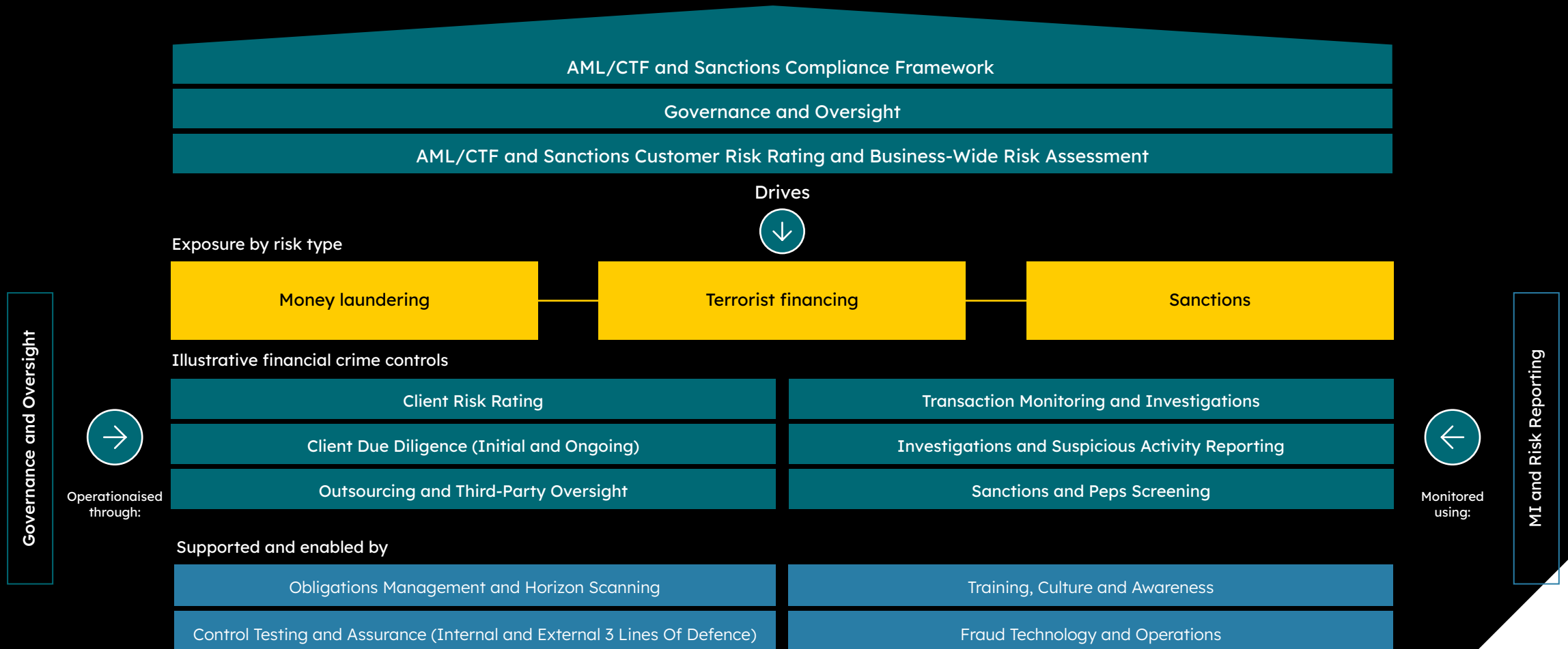
Compliance solutions*



*Examples of vendors are not exhaustive and provided only for illustrative purposes.

Development and independent assessment of control frameworks

Getting a licence for crypto activities is just the beginning. Regulators demand robust policies, procedures, systems and controls to meet obligations and mitigate financial crime risks. We tailor these frameworks to your operations, ensuring full compliance – or we can conduct independent assessments of existing frameworks. Let us help you navigate this critical phase with confidence.





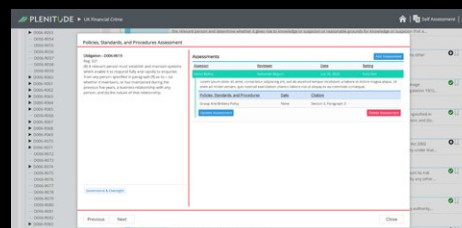
Digital Assets Practice

Our RegTech products

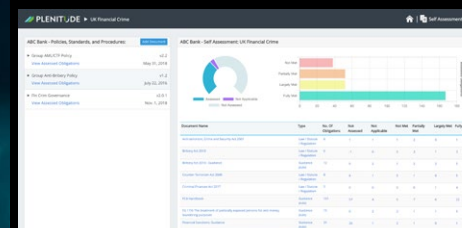
Our RegTech subscription services put our clients in the driving seat – to manage financial crime obligations, country and client risk more effectively while reducing internal risks, costs and resource demands.



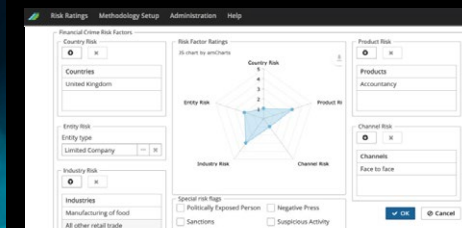
RegSight (Obligations Register) is the ultimate online solution for managing your FCC obligations, ensuring your organisation meets all requirements. Stay informed with relevant obligations and our monthly horizon scanning service, monitoring 200+ legal and regulatory sources to keep you prepared for changes in financial crime laws, regulations and guidance.



Compass offers a risk-rated country list with detailed methodology, research, analysis and data, all accessible via an online portal. The annual subscription includes quarterly updates to the country list and data.



ClientSight is a cloud-based app delivering our top-tier financial crime client risk rating methodology. Developed and tested at major global institutions, it helps firms assess clients' inherent financial crime risk and determine the necessary level of due diligence and monitoring.





Manuel Fajardo

Digital Assets Practice Lead

With over 17 years in global asset management, Manuel brings a wealth of experience in compliance, internal control and internal audit, having worked in Paris, London and Los Angeles. Before joining Plenitude, he built a global compliance framework for a major investment management group, expertly balancing local and global considerations, particularly in anti-money laundering, international sanctions and financial promotions / distribution.

Manuel's deep knowledge of the cryptoassets industry, honed over eight years of study, investment and advisory work, is invaluable. He's trained traditional finance companies on this emerging sector and its regulatory landscape, advised crypto firms on compliance, and influenced regulatory discussions through industry trade bodies.

Fluent in four languages and adept at handling multiple complex topics, Manuel's pragmatic, solutions-oriented approach and rigorous expertise make him a key asset for any project. His global regulatory insights and ability to craft successful frameworks are crucial for navigating today's dynamic financial landscape.



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