



GIBRALTAR

DLT License Pathway

DLT route design, entity and governance setup, AML/CFT controls, licensing readiness and operational launch support

DLT route mapping Governance & controls Launch readiness

Prepared by	VASP-License.com
Jurisdiction	Gibraltar
Service focus	Gibraltar DLT framework, exchange / custody / crypto-payment models, governance, AML/CFT and operational readiness
Proposal validity	To be confirmed in engagement documentation
Commercial terms	Private quote following scoping

EXECUTIVE SUMMARY

Gibraltar DLT licensing pathway

Gibraltar offers a Europe-based, non-EU route for DLT-focused businesses. The engagement is designed around a compliance-first execution plan covering business-model classification, entity and governance setup, AML/CFT controls, licensing-readiness implementation and practical onboarding for international founders.

30 minutes	3-5 business days	Private quote
Initial scoping call	Tailored roadmap delivery	Final package after scoping

The pathway is suitable for exchange, brokerage-style, custody, wallet, crypto-payment, transfer and settlement models. Gibraltar's DLT framework is principles-based and outcomes-focused, so the final licensing and operational build is matched to the applicant's services, governance depth, target markets and risk profile.

Engagement option summary

Package / service	Professional fees	Estimated timing / stage
30-minute scoping call	Included in engagement process	Initial stage
Tailored Gibraltar DLT roadmap	Included in engagement process	3-5 business days
Package A - DLT Foundation	Private quote	Implementation scope
Package B - DLT + Advanced Operations	Private quote	Enhanced implementation
Ongoing local operational support	Quoted separately	Ongoing / as required

Pricing is provided privately because the required licensing scope, governance depth and implementation workload vary materially by business model. The engagement begins with a 30-minute scoping call. A tailored roadmap is then prepared within approximately 3-5 business days, after which the appropriate DLT foundation or advanced-operations package is confirmed.

SCOPE OF WORK

1. Route design, entity & governance setup

The initial stage maps the proposed services to the Gibraltar DLT pathway and establishes the legal, governance and operational structure needed for the project. Work is organized around ownership, management responsibilities, target markets, service flows, local support requirements and the evidence expected for licensing readiness.

Route & governance foundation

Core structuring and readiness work.

- Business-model and service classification
- Jurisdiction-fit and DLT pathway mapping
- Entity and governance setup guidance
- Role ownership and local-support assessment
- Licensing-readiness implementation planning

Best-fit business models

Common DLT structures assessed during scoping.

- Crypto exchange and brokerage-style platforms
- Custody and wallet-service operators
- Crypto payment processors
- Transfer and settlement models
- Related DLT platform operations, model-dependent

Foundation-stage workstreams

Service / item	Professional fees	Estimated timing
Route design, entity & governance setup	Included in selected package	Initial implementation stage

2. Gibraltar DLT Foundation

Package A establishes the core foundations for a Gibraltar-regulated DLT operation. It combines business-model and service classification with jurisdiction-fit analysis, entity/governance guidance, AML/CFT control architecture and a structured licensing-readiness checklist.

- Business-model and service classification for the proposed DLT activities.
- Jurisdiction-fit and licensing-pathway mapping for exchange, custody, payment or related models.
- Entity, governance and role-ownership setup guidance.
- AML/CFT policy architecture, control design and licensing-readiness implementation checklist.

Service / item	Professional fees	Estimated stage
Package A - Gibraltar DLT Foundation	Private quote	Implementation scope

GIBRALTAR DLT REGULATORY POSITION

Principles-based supervision for DLT business models

The Gibraltar DLT framework is structured around principles-based, risk-focused supervision. The operating model and control environment are expected to demonstrate clear governance, responsible management, effective AML/CFT controls and an operational structure appropriate to the services being provided. Gibraltar is in Europe but outside the EU framework, making it a distinct non-EU route for selected international crypto business models.

Trading & liquidity models	Custody & payment models
Common market-facing structures. • Spot exchange operations • Brokerage and principal / agency dealing flows • Platform-based execution services • Related market operations, model-dependent • Control scope matched to customer and flow profile	Asset-control and transaction-flow structures. • Custody and wallet-service architecture • Crypto payment-processing flows • Transfer and settlement workflows • Client onboarding and transaction-control stack • Operational safeguards tailored to the model

Typical activity coverage

Common Gibraltar DLT structures include spot exchange operations, brokerage and principal/agency dealing flows, custody and wallet services, crypto-payment processing, transfers, settlement workflows and related platform operations. Final activity scope is confirmed during onboarding and mapped to the proposed control and governance environment.

Standard DLT readiness deliverables

01	Business-model classification and Gibraltar DLT pathway roadmap
02	Entity, governance, management-role and operational-structure design
03	AML/CFT policy and control architecture aligned to the proposed model
04	Client onboarding, monitoring, escalation and reporting workflow design
05	Licensing-readiness implementation checklist and evidence-pack preparation
06	Launch-readiness handover and recurring local-support coordination, where selected

COMPLIANCE & OPERATIONS

3. AML/CFT, monitoring & governance controls

The compliance workstream is tailored to the approved operating model and is intended to create a coherent control environment for onboarding, ongoing monitoring, escalation and evidence production. For more complex businesses, the framework can be deepened through enhanced governance, reporting and post-launch operational support.

- AML/CFT policy and control architecture aligned with the proposed customer and transaction profile.
- Client onboarding, transaction-control, monitoring, escalation and reporting workflow design.
- Governance, role ownership and evidence-pack preparation for licensing-readiness and operational handover.

Service / item	Professional fees	Estimated stage
AML/CFT, governance & evidence-pack preparation	Included in selected package	Implementation / readiness

4. Advanced operations & ongoing local support

Package B adds enhanced governance and escalation design, deeper monitoring/reporting workflows, operational handover and evidence-pack support to the DLT Foundation scope. Ongoing Gibraltar structures commonly include recurring compliance coverage, accounting/audit coordination, local legal contact and office/address continuity support. These recurring services are scoped according to the final operating model.

Service / option	Professional fees / inclusion	Frequency / stage
Package A - DLT Foundation	Private quote	Project scope
Package B - DLT + Advanced Operations	Private quote	Enhanced project scope
Compliance function / control oversight	Quoted separately	Ongoing / as required
Accounting & audit coordination	Quoted separately	Ongoing / annual
Local legal/contact layer	Quoted separately	Ongoing / as required
Local office / address continuity	Quoted separately	Ongoing / as required

Ongoing operational services are quoted separately following the licensing and substance assessment. Pricing depends on the required compliance function, accounting/audit workload, local legal/contact layer, office/address requirements and any additional governance or post-launch support.

ONBOARDING & DELIVERY

5. Model-first scoping & implementation roadmap

Before work begins, VASP-License.com will map the proposed services, target markets, expected monthly volume, custody or payment flows, management structure, banking needs and intended launch model. This scoping stage determines the appropriate package, governance depth, control framework and implementation sequence.

Service / item	Professional fees	Delivery stage
Model scoping, DLT route mapping & implementation roadmap	Included in engagement process	Initial onboarding stage

Project information to confirm

- Proposed services: exchange, brokerage, custody, wallet, crypto payments, transfer, settlement or related DLT activities.
- Target markets, customer types, expected monthly volumes, transaction flows, counterparties and banking requirements.
- Ownership / UBO structure, management roles, governance responsibilities and expected local support requirements.
- Existing policies, onboarding / monitoring systems, technology stack and operational documentation available for the project.

Indicative project flow

01	Scoping call: services, target markets, volumes, banking and launch objectives
02	DLT pathway mapping, jurisdiction fit and governance-depth confirmation
03	Entity / operating structure, role ownership and local-support planning
04	AML/CFT, onboarding, monitoring, escalation and evidence-pack build
05	Licensing-readiness implementation, operational testing and handover
06	Launch coordination and recurring compliance / accounting / local support, if selected

A tailored Gibraltar roadmap is normally delivered within approximately 3-5 business days after the scoping call and receipt of the required business-model information. The full licensing and implementation timeline is project-specific and depends on the final scope, readiness of the applicant, governance/substance requirements and the applicable regulatory review process.

COMMERCIAL SUMMARY

6. Packages, delivery & inclusions

Initial scoping call	30 minutes.
Roadmap delivery	Approximately 3-5 business days.
Package A - DLT Foundation	Private quote.
Package B - DLT + Advanced Operations	Private quote.
Ongoing operational support	Quoted separately according to required local substance and support.
Licensing timeline	Project-specific; confirmed after scoping and readiness assessment.
Tax / structuring	Case-specific and subject to professional advice.
Banking / third parties	Assistance may be coordinated; approval remains with the relevant institution.

7. Structuring notes

Gibraltar is often considered for its combination of DLT-focused regulation, European positioning and operational flexibility. Tax treatment is structure-specific; Gibraltar is commonly presented with a 15% corporate-tax lens on profits sourced in or from Gibraltar, a 0% VAT framework position and 0% capital-gains positioning, subject to current rules and professional advice.

8. Important notice

DLT licensing, activity approval and any related onboarding remain subject to the applicable Gibraltar regulatory and institutional review. Final scope, fees, governance requirements and recurring operational services are confirmed after business-model scoping. Banking or other third-party onboarding cannot be guaranteed and is subject to the relevant institution's own requirements.

Acceptance of proposal

By signing below, the representative instructs VASP-License.com to prepare engagement documentation for the selected Gibraltar DLT workstreams, including route design, governance, AML/CFT controls, licensing-readiness implementation and any agreed operational-support components, subject to onboarding and final scope confirmation.

Full name _____

Position _____

Signature

Date _____