

# Argentina Tokenization

## RG CNV 1069/2025

PSAV obligations • Custody • AML • Disclosure

CNV framework

PSAV requirements

Go-live support

# About Ready Corp

Global financial licensing & compliance - delivered 100% remotely



## Who we are

Ready Corp is a global consultancy firm specializing in licensing, compliance, and corporate structuring for companies operating in the crypto, fintech, and financial sectors. With years of hands-on experience, our expert team has helped hundreds of businesses navigate complex regulatory landscapes - efficiently, remotely, and always with full legal clarity.

Whether you're looking to launch a VASP, establish a PSP, or register a MSB, Ready Corp provides tailored support at every stage - from incorporation and licensing to ongoing compliance and maintenance.

Our services are designed with international founders and foreign investors in mind. We understand the challenges of entering unfamiliar markets - the legal systems, regulatory differences, and cultural nuances - and we work to eliminate that friction.

## Core services

### Licensing:

- |                             |             |
|-----------------------------|-------------|
| Crypto / VASP / DASP / CASP | CASP (MiCA) |
| PSP                         | PI          |
| EMI                         | MSB         |
| IFPE                        |             |

### Compliance:

- |                         |            |
|-------------------------|------------|
| Local Director / Office | Accounting |
| MLRO                    | Audit      |

Delivered remotely with clear milestones and documentation.

## Why Argentina for tokenization

A modern regulatory sandbox for tokenized securities & RWAs



### Regulatory clarity

CNV introduced a formal tokenization regime (RG 1069/2025) and expanded it via later stages - providing a regulated path to market.



### RWA-friendly scope

Stage 1 explicitly supports digital representation for certain RWA-backed trusts and closed-end funds - built for real-world assets.



### First-mover advantage

Early compliant operators can launch within sandbox windows, build investor trust, and set best-practice controls from day one.

Launch within the CNV sandbox with PSAV-compliant controls, disclosures, and audit-ready operations.

## Regulation overview: CNV tokenization regime

RG 1069/2025 (Stage 1) + expansions (RG 1081/1087)



### What the regime enables

A regulated framework for digital representation of publicly offered securities via DLT - with investor protections and disclosure rules.



### Role of PSAVs

Only registered PSAVs may commercialize tokenized securities through their digital platforms, with non-delegable custody and operational duties.



### Sandbox constraints

Issuances are limited to sandbox windows. Authorized securities must be effectively tokenized within set deadlines to remain valid under the regime.

# PSAV obligations at a glance

Key responsibilities to operate under the tokenization regime



**Exclusive commercialization**

Only registered PSAVs may commercialize tokenized securities through their platforms/apps.

No non-tokenized trading under regime



**Custody & segregation**

Segregated ADCVN accounts, off-balance-sheet treatment, and clear client/house separation.

ADCVN segregated accounts • off-balance sheet



**Investor protection**

Transparent risk disclosure, real-time ownership access, and clear voting/profit/redemption processes

Rights execution • disclosures • data protection



**AML/CFT + transfer restrictions**

CNV AML/CFT rules apply; tokenized securities cannot be transferred to unauthorized parties or DeFi protocols.

KYC/KYB • monitoring • restricted transfers



**Operational & tech standards**

DLT standards for immutability, identity verification, traceability, cybersecurity, and contingency planning.

DLT controls • auditability • contingency

Built for regulated tokenized securities • Investor-first • Audit-ready • CNV-aligned

## Compliance checklist

Controls you must implement before launch



### 1. Registration & governance

PSAV registration in force

- ❖ Defined roles: compliance, ops, tech
- ❖ Policies + procedures approved



### 4. Disclosure & investor rights

AIF publication + notices

- ❖ Voting/profit/redemption flows
- ❖ Data protection (Law 25.326)



### 2. Custody & accounting

Segregated ADCVN accounts

- ❖ Client assets off balance sheet
- ❖ Internal ledgers & reconciliation



### 5. Deliverables

Eligibility + structure memo

- ❖ PSAV controls pack (ops + tech)
- ❖ Disclosure pack (AIF + notices)
- ❖ Go-live checklist



### 3. Technology & operations

DLT infrastructure + cybersecurity

- ❖ Audit trails + reconciliations
- ❖ Business continuity + incident response

## Operational & technological duties

Non-delegable PSAV responsibilities under the regime



### Key responsibilities

- Digital custody via secure DLT-compatible infrastructure.
- Traceability & auditability of all transactions.
- Mechanisms for investor instructions (votes, redemptions, distributions)



### Large offering safeguard

A designated backup PSAV may be required for large offerings (e.g., > 7,000,000 UVAs threshold referenced in regime guidance).



### Core controls to evidence compliance

- Security architecture + access controls
- Logging + audit trails + reconciliations
- Smart-contract / platform testing + change management
- Incident response + business continuity



### Operational readiness

Procedures documented; staff trained; evidence retained for CNV review and audit.

Estimated timeframe: 6-10 weeks (depending on structure, PSAV readiness, and documentation status)

## Investor protection + AML/CFT program

A practical operating model for compliant tokenized offerings



### Program cadence

Ongoing workstreams to keep controls, disclosures, and monitoring aligned with CNV requirements (before and after launch).



### Workstreams

- A. Regulatory mapping
- B. AML/CFT controls
- C. Investor protections + disclosures
- D. Tech risk + continuity



Regulatory mapping



AML/CFT controls



Investor protections



Tech risk & continuity

## Disclosure & transparency

Public information duties and launch notices



### AIF publication

Publish details of tokenized offerings in the Financial Information Highway (AIF), including terms, risks, and investor rights processes.



### Material fact notice + advertising

File a “material fact” notice at least 5 business days before launch.

- ❖ Marketing must be clear, non-deceptive, and avoid technical jargon unless explained.

## Use cases & market potential

Where tokenization creates immediate value



### Real-world assets (RWAs)

Tokenized representation can support fractional access and streamlined distribution for eligible RWA-backed structures.



### Efficiency + auditability

DLT can improve traceability, reporting, and operational controls - when implemented with a CNV-aligned framework.



### First-mover positioning

A compliant launch can unlock partnerships, investor confidence, and institutional readiness ahead of broader market adoption.

We help teams structure, document, and operationalize tokenized offerings with clear controls and CNV-ready disclosures.

## Implementation roadmap

From eligibility to launch, with audit-ready evidence



### Gap analysis

Review structure, PSAV readiness, custody model, and disclosures against CNV regime requirements.



### Documentation pack

Policies, procedures, AIF disclosures, investor workflows, and operational evidence packs prepared for review.



### Go-live readiness

Testing, contingency planning, staff training, and launch notices — ensuring compliance and continuity from day one.

Outcome: compliant launch + operational readiness + ongoing support as requirements evolve.

## Client support

Built for tokenization operators and regulated issuers



### PSAVs & Exchanges

Operating model design, CNV-aligned controls, custody segregation, disclosure workflows, and audit support.



### Compliance-firs

† Clear controls  
from day one



### Issuers & SPVs

Structuring for eligible instruments, coordination with advisors, disclosure drafting, and launch planning.



### Faster launch

Milestone-driven  
delivery



### Asset managers & trustees

RWA structuring support, investor rights processes, reporting design, and operational governance.



### Global coverage

Multi-jurisdiction  
coordination

## Trusted Partnerships, Proven Results

Local presence for operational continuity and support

### A few select clients and partners



## Our global offices

Direct coverage across multiple jurisdictions



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## Let's get you licensed - the right way

Schedule a consultation or visit our website

### Partner with Ready Corp for Global Compliance Success

Schedule a consultation or reach us via the channels below.



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