

**ReadyCorp – Your Partner in Global Financial Licensing & Compliance**

**A Modern Solution for Fintech, Crypto, and Financial Licensing Services**



[www.readycorp.co](http://www.readycorp.co)

# About ReadyCorp



Ready Corp Ltd. 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 Virtual Asset Service Provider (VASP), establish a Payment Service Provider (PSP), or register a Money Services Business (MSB), ReadyCorp 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.

**Popular services provided include, but not limited to:**

- VASP (Virtual Asset Service Provider) / Crypto License from LATAM, Europe, Asia, & South Africa
- CASP (Crypto Asset Service Provider) \*MiCA compliance from Europe
- PSP (Payment Service Provider) License
- PI (Payment Institution) License
- EMI (Electronic Money Institution) License
- MSB (Money Service Business) License
- IFPE (Electronic Payment Fund Institution) License
- Company Maintenance and Compliance Packages



The image features a central graphic of the Brazilian flag, which is a green field with a large yellow rhombus in the center. Overlaid on the yellow rhombus is a large, semi-transparent Bitcoin logo. The background is a dark blue space filled with a complex network of glowing green and blue lines and dots, resembling a digital or neural network. The text "BRAZIL" is written in a bold, white, sans-serif font across the upper part of the yellow rhombus. Below it, the text "Pre-Existing VASP" is written in a larger, bold, white, sans-serif font, spanning across the width of the rhombus and slightly into the surrounding background.

# **BRAZIL**

# **Pre-Existing VASP**

# New Key Requirements



In November 2025 the Central Bank of Brazil (BCB) issued Resolutions 519, 520 and 521, which implement the 2022 crypto law (Lei 14.478/2022) and create the formal category "Sociedades Prestadoras de Serviços de Ativos Virtuais" (SPSAV/PSAV/VASP) ***The rules start applying on 2 February 2026, and must file for BCB authorization as a SPSAV by October 30, 2026.***

- **Mandatory BCB licence** for anyone providing core virtual-asset services in Brazil (exchange, brokerage, custody, transfer, etc.), with fit-and-proper tests for controllers and managers and detailed authorisation processes under Resolution 519.
- **Brazilian presence:** VASPs must be constituted and headquartered in Brazil; foreign platforms can't keep serving Brazil from abroad unless they route business through a locally authorised institution or a Brazilian SPSAV.
- **Institutional category and capital:** new SPSAV category (intermediary, custodian, broker), with minimum paid-in capital between R\$ 10.8m and R\$ 37.2m depending on the business model and risk.
- **Bank-style governance & AML/CTF:** robust governance, internal controls, audited financials, PLD/FT policies, transaction monitoring, customer due diligence and suspicious-transaction reporting, essentially mirroring standards for other supervised financial institutions.
- **Segregation of client assets & proof of reserves:** strict separation between client funds and the VASP's own funds/crypto, mandatory governance around custody vs. intermediation, and explicit "prova de reservas" (proof of reserves) plus cybersecurity requirements.
- **Stablecoins & cross-border flows treated as FX:** many stablecoin payments and cross-border crypto transfers are now treated as foreign-exchange operations, with reporting duties and caps (e.g. US\$100k limit per transaction with non-authorised counterparties)

# New Key Requirements: Expanded



Any exchange, broker, custodian or platform already serving Brazilian clients will have to “regularize” into the new SPSAV regime. In practice, that means:

- **File for BCB authorization as an SPSAV no later than 30 October 2026.** VASPs that submit the application on time may continue operating while the Central Bank analyses the case, but cannot expand into new service modalities in that interim. Those that miss the deadline must stop providing virtual-asset services within 30 days after the deadline.
- **Be a Brazilian entity:** existing VASPs operating in Brazil must ensure they are incorporated and headquartered in Brazil, and must adapt their corporate name to include the wording “Sociedade Prestadora de Serviços de Ativos Virtuais” (or equivalent). Sole-member companies with an individual as the only shareholder are not allowed.
- **Foreign VASPs currently serving Brazil:** by 30 October 2026, foreign-incorporated exchanges must either:
  - Migrate operations and clients to a Brazilian SPSAV, or
  - Channel Brazilian users through banks, FX brokers or other BCB-authorised institutions, if they want to remain in the market; otherwise they must exit.
- **Upgrade internal structure** to bank-level standards:
  - Implement or upgrade PLD/FT policies, risk management, fraud-prevention and continuity plans;
  - Formalise segregation of client funds and assets, and set up proof-of-reserves routines;
  - Strengthen governance (board/committees, compliance, internal audit);
  - Implement cybersecurity and incident-response frameworks and detailed transaction monitoring, including identification of self-hosted wallets and cross-border operations as required by Resolution 521.

# Compliance Requirements



- ❖ **Mandatory prior authorization:** all VASPs must obtain authorization from the BCB before starting operations.
- ❖ **Evaluation criteria:** the BCB will analyze the financial and operational capacity of the controllers, the origin of the resources, the viability of the business, and the company's governance structure.
- ❖ **Headquarters and physical presence:** the use of coworking spaces or virtual offices will not be permitted, except when belonging to the same economic group.
- ❖ **Governance and integrity requirements:** administrators and controllers must demonstrate technical qualification and an unblemished reputation.
- ❖ **Participation of investment funds:** permitted only as non-controlling investors; controlling positions are prohibited.
- ❖ **Communication of corporate changes:** any change in control or structure must be previously communicated to the BCB.
- ❖ **Cybersecurity:** implementation of governance policies, internal controls, and incident response plans.
- ❖ **Asset segregation:** own assets fully segregated from clients' assets. Independent Audit (biennial): mandatory for verification of reserves and asset segregation.
- ❖ **Foreign exchange classification:** transactions with virtual assets are now considered foreign exchange transactions and must be registered and reported to the Central Bank of Brazil (BCB).
- ❖ **Scope:** payments, international transfers, remittances to wallets, purchase and sale of virtual assets referenced in foreign currency, and transfers between clients.
- ❖ **Operational limits:**
  - Up to US\$ 500,000: counterparty authorized to operate in foreign exchange;
  - Up to US\$ 100,000: unauthorized counterparty;
  - Up to US\$ 50,000: simplified operations.
- ❖ **Mandatory identification:** identification of holders of self-custody wallets and verification of the origin and destination of funds.
- ❖ **AML/CFT compliance:** full application of anti-money laundering and counter-terrorism financing regulations.
- ❖ **Reports:** monthly submission to the BCB, by the fifth business day, detailing the transactions with virtual assets carried out.

# Project Fee



**Product:** Registry of Virtual Asset Service Providers.

**Regulator:** Brazilian Central Bank (BCB)

Our professional fees for these activities amount to:

**Assistance to Comply with Resolutions No. 519, 520, and 521: contact us**

**Monthly Service Fees\*:** UIF incorporation and compliance with AML/FT obligations

- Local Legal Contact and Address
- MLRO Registered with **Financial Activities Control Board (COAF)**

\*Monthly services are optional and subject to mutual consent of both parties. In the case that any of these services are hired, a 30 day notice is required to cancel it. (Reporting, transaction monitoring, alert, company tax declaration, audit)



# Proof of Pre-Operational Status



To be eligible for inclusion in the grace period, the company must be able to demonstrate that it was operational before the regulation's publication. One of the main indicators the Central Bank considers is compliance with Brazilian Federal Revenue Instruction No. 1888/2019, which requires Virtual Asset Service Providers (VASPs) to report transactions involving crypto assets to the tax authorities.

In practice, this means the company must:

- Have initiated operations and executed transactions prior to the new regulation; and
- Have submitted reports to the Federal Revenue Service (RFB) in accordance with IN 1888/2019, evidencing such activity.

There is no minimum transaction volume required. Potentially, opening a wallet under the Brazilian company name so that transactions could be initiated and reported in accordance with IN 1888/2019.

Minimum Share Capital requirements are specific to the activities performed by each regulated entity. VASPs, which under the previous public consultation were expected to hold a minimum capital of BRL 3 million, may now face requirements exceeding BRL 15 million.

The Virtual Asset Service Provider already in operation must prove its prior operation through formal communication to the BCB (Central Bank of Brazil), within 270 days from February 2, 2026, accompanied by technical certification prepared by an independent qualified company, under terms that will still be defined by complementary regulations.



# Conclusion



Our proposal delivers substantial added value to the client by offering services that extend well beyond the scope of traditional regulatory technical advice. This includes:

- **Specialized Expertise:** Our team brings years of hands-on experience in this niche sector and related fields. This rare specialization enables us to provide robust technical and regulatory support to your internal development teams, ensuring the project is built on solid foundations.
- **Comprehensive Evaluation:** We engage actively during both the development and evaluation phases of digital platforms, ensuring full alignment with applicable regulatory frameworks. Our involvement allows us to propose tailored technical and legal solutions that support compliance from day one.
- **Documentation and Support:** We assist in drafting essential support materials such as terms and conditions, FAQs, and operational documentation—key tools that facilitate both user experience and regulatory readiness.

This holistic support ensures the company is equipped not only with strategic compliance insight but also with the operational tools necessary for a smooth, secure, and compliant launch.

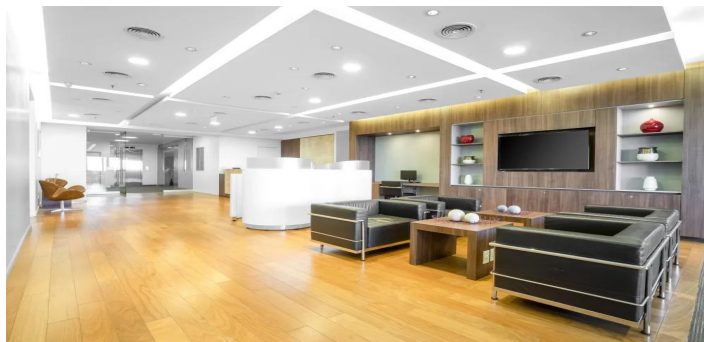
In short, our approach is comprehensive, practical, and results-driven. We are committed to delivering high-quality services that not only meet regulatory requirements but also create long-term value for your business.

# Our Office in Argentina



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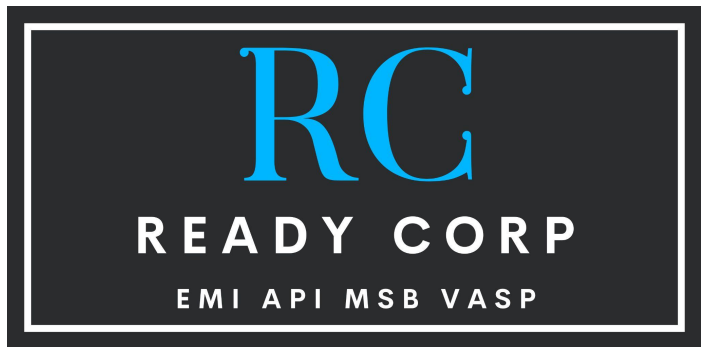
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# Trusted Partnerships, Proven Results



# Partner with ReadyCorp for Global Compliance Success



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