

WHITEPAPER REGISTRATION FORM GUIDELINES

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REVISIONS LOG

VERSION	DATE ISSUED	DETAILS
1.00	30 JANUARY 2019	DOCUMENT ISSUED
2.00	15 MAY 2019	UPDATED WITH GUIDELINES ON STAGE TWO OF THE WHITEPAPER REGISTRATION FORM

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Title 1 General

Section 1 Scope and Application

G3-1.1.1 The Guidelines to the Registration Form for Whitepapers under the Virtual Financial Assets Act ('the Whitepaper Registration Form') are issued to assist Issuers wishing to register their Whitepaper under Article 3 of the Virtual Financial Assets Act (Chapter 590 of the Laws of Malta) ('the Act') ('the Applicant') and their appointed VFA Agent in compiling the Whitepaper Registration Form.

Section 2 High Level Guidelines

G3-1.2.1 The Whitepaper Registration Form shall be duly filled in by the VFA Agent appointed by the Applicant.

G3-1.2.2 The VFA Agent and the Applicant shall notify the MFSA immediately if the information provided changes in any material respect either prior or subsequent to registration.

G3-1.2.3 The VFA Agent and the Applicant understand that it is a criminal offence, under Article 53(2) of the Act, to knowingly or recklessly, furnish information or to make a statement which is inaccurate, false or misleading in any material respect, pursuant to any of the provisions of this Act or of any Regulations made or of any Rules issued thereunder, or any condition, obligation, requirement, directive or order made or given as aforesaid.

G3-1.2.4 The VFA Agent and the Applicant is required to make reference, and where applicable comply with, the Act, the Regulations made or Rules issued thereunder during the completion of the Registration Form.

G3-1.2.5 The VFA Agent and the Applicant shall make reference to Chapter 2 of the VFA Rulebook when determining the applicable requirements. The VFA Agent shall also make reference to Chapter 1 of the VFA Rulebook.

G3-1.2.6 The VFA Agent and Applicant shall not tamper with, or modify in any manner the Annexes to the Whitepaper Registration Form. Should it transpire that these were tampered with, or modified in any manner, the Authority shall consider the VFA Agent and the Applicant to be in breach of these Guidelines. Any potential improvements should be communicated to the MFSA for consideration.

G3-1.2.7 The Authority may, at its sole discretion, request the Applicant, through its VFA Agent, to provide any further information and/or documentation.

Section 3 *Definitions*

G3-1.3.1 Unless otherwise specified, terms used in these Guidelines shall have the same meaning assigned to them under the Act, the Regulations issued thereunder and the Glossary to the VFA Rulebook.

Section 4 *Date of Application*

G3-1.4.1 These Guidelines shall apply from 30 January 2019.

Title 2 Methodology

Section 1 *Scope and application*

G3-2.1.1 This Title outlines the methodology underpinning the Registration Form, its underlying methodology and the respective validations and reporting requirements.

G3-2.1.2 This Title shall be applicable to Applicants falling within scope of Section 1, Title 1 of these Guidelines.

Section 2 *Whitepaper Registration Form*

G3-2.2.1 The MFSA shall only be considering applications for registration made through the submission of the Whitepaper Registration Form, which is publicly available online on the Virtual Financial Assets Framework page on the MFSA website, through the following link:

<https://www.mfsa.com.mt/fintech/>

G3-2.2.2 Pursuant to G3-2.2.1, VFA Agents shall be directed towards the Apply for Authorisation section, where he or she shall proceed to initiate the **Whitepaper registration process by selecting the "Apply Now"** button.

G3-2.2.3 Upon being logged in, VFA Agents may proceed to the Whitepaper Registration Form by selecting the *"Registration Form for Whitepapers under the Virtual Financial Assets Act"* under the **"Apply for a licence"** tab.

Section 3 *General*

G3-2.3.1 The Whitepaper Registration Form is divided in two stages. In order for the Application, to be considered complete, the VFA Agent is required to complete both stages of the registration process.

G3-2.3.2 For the purposes of G3-2.3.1, following the submission of Stage One of the Whitepaper Registration Form, the Authority will undergo a preliminary review of the submitted documentation. Subsequently, upon completion of the review by the Authority, the Applicant will be given permission to proceed to Stage Two of the registration process.

G3-2.3.3 Stage One of the Whitepaper Registration Form consists of the following Parts:

- i. Part 1 - Entity Details
- ii. Part 2 - Virtual Financial Asset Details and Whitepaper Details

iii. Part 3 - Fees and Declaration

G3-2.3.4 Subsequent to G3-2.3.3, Stage Two of the Whitepaper Form consists of the following Parts:

- i. Part 4 – Organisational Structure
- ii. Part 5 – Beneficial Owners and Qualifying Unitholders
- iii. Part 6 – Internal Governance
- iv. Part 7 – Functionaries

G3-2.3.5 VFA Agents are to note that the Application should be completed in a sequential manner proceeding from Part 1 to the next. It is also noted that upon saving and continuing towards another part of the Application, the VFA Agent would not be able to modify and/or alter that part in any way or form.

G3-2.3.6 In order for the Application to be considered complete, the VFA Agent shall have to submit all the required documentation as identified within the Whitepaper Registration Form and its respective Annexes.

Section 4 Validations

G3-2.4.1 In order to facilitate the application process, the Registration Form includes several validations which assist and guide the VFA Agent during its compilation.

G3-2.4.2 Pursuant to G3-2.4.1, the VFA Agent will not be able to submit the Registration Form unless the respective validations are met.

Section 5 Attachments and Integrations

Sub-section 1 General

G3-2.5.1.1 The VFA Agent shall be requested to upload and attach several documents/files throughout the Registration Form. Such documentation is to be uploaded in .pdf format unless otherwise specified.

G3-2.5.1.2 Uploaded documentation should be of sufficient resolution to enable legibility and should be saved as follows unless otherwise specified:

YYYYMMDD_ApplicantName_DocumentName

G3-2.5.1.3 The Authority may, at its sole discretion, request the VFA Agent to submit originals or certified true copies of the uploaded and attached documentation, as it may deem necessary.

G3-2.5.1.4 VFA Agents shall be required to resubmit the respective Annexes should it transpire that these have been tampered with and/or unprotected.

Sub-section 2 Annex 1 to the Whitepaper Registration Form

G3-2.5.2.1 Annex 1 should be downloaded from the respective Section under Part 2 of the Application and duly filled in pursuant to G2-3.2.2.2 of these Guidelines.

G3-2.5.2.2 This attachment should be uploaded once in .xlsm format.

Sub-section 3 Annex 2 to the Whitepaper Registration Form

G3-2.5.3.1 Annex 2 should be downloaded from the respective Section under Part 3 of the Registration Form and duly filled in pursuant to Sub-section 2, Section 3 of Title 3 of these Guidelines.

G3-2.5.3.2 Pursuant to G3-2.5.3.1, this Annex should be:

- i. printed, by using the print icon found on the top right-hand corner of the Annex;
- ii. signed by the Designated Person identified within Section A of the Whitepaper Registration Form and two representatives of the Applicant, which include (i) Administrator/s, (ii) judicial representative/s and/or (iii) other Duly Authorised Representative/s.
- iii. uploaded and attached to the Registration Form in .pdf format; and
- iv. submitted in original to the MFSA, to the attention of the FinTech Team.

Title 3 Considerations for Stage One of the Whitepaper Registration Form

Section 1 Scope and application

G3-3.1.1 This Title outlines Stage One of the Whitepaper Registration Form, and the respective requirements.

G3-3.1.2 This Title shall be applicable to Applicants falling within scope of Section 1, Title 1 of these Guidelines.

Section 2 Part 1: General Details (Incorporated/Registered or otherwise)

Sub-section 1 Section A: VFA Agent Details

G3-3.2.1.1 The VFA Agent is required to insert the VFA Agent details. The name, surname and contact email of the VFA Agent Designated Person is automatically generated from the log-in details of the person compiling the Whitepaper Registration Form. The VFA Agent is required to disclose the respective registration number and entity name. In cases where the VFA Agent has not yet been authorised and registered by the MFSA the field **should be filled in as "N/A"**.

Sub-section 2 Section B: Applicant Details

G3-3.2.2.1 The VFA Agent is required to disclose all the relevant information as required under the Applicant Details sub-section.

G3-3.2.2.2 The VFA Agent may still proceed with the application in case the entity of the Applicant is **still in formation. This may be done by inserting "N/A" for the Entity Registration Number and by leaving the registered date blank.** In this case, the general details of the Applicant should be understood as being proposed details.

These would then need to be updated once the MFSA issues its in-principle approval, upon receipt of which the Applicant shall proceed with the incorporation/registration of the entity.

G3-3.2.2.3 The VFA Agent is also requested to disclose the respective social media presence of the Applicant by providing the respective URLs, as applicable.

Sub-section 3 Section C: Applicant Accounting Details

G3-3.2.3.1 The VFA Agent is requested to disclose **the Applicant's Accounting Reference Date and the respective Reporting Currency.**

<i>Sub-section 4</i>	<i>Section D: Applicant Formation Evidence</i>
G3-3.2.4.1	<p>The VFA Agent is required to upload and attach the below documents to provide evidence of the entity set up for the purposes of the Applicant's operation:</p> <ul style="list-style-type: none"> i. the Memorandum and Articles of Association or any other constitutional documents; and ii. a Board Resolution or, in the case where the entity's Legal Form is not a company, a document indicating agreement to apply for registration of the Whitepaper.
G3-3.2.4.2	<p>For entities that have not been set up prior to the coming into force of the VFA Act, the VFA Agent is required to upload a draft Memorandum and Articles of Association or any draft other constitutional document; and a draft Board Resolution or, in the case where the entity's Legal Form is not a company, a draft document indicating the Administrators' agreement to apply for registration of the Whitepaper.</p>
<i>Section 3</i>	<i>Virtual Financial Asset Details and Whitepaper Details</i>
<i>Sub-Section 1</i>	<i>Section A: Financial Instrument Test</i>
G3-3.3.1.1	<p>The VFA Agent is required to agree that the determination of the Financial Instrument Test indicates that the DLT Asset is a Virtual Financial Asset as termed under the Virtual Financial Assets Act.</p>
G3-3.3.1.2	<p>The VFA Agent is then required to upload and attach the following files:</p> <ul style="list-style-type: none"> i. Financial Instrument test (.xlsm format); and ii. Declarations Sheet of the Financial Instrument Test duly signed in accordance with the Guidelines to the Financial Instrument Test (.pdf format in colour).
<i>Sub-Section 2</i>	<i>Section B: Whitepaper Details</i>
G3-3.3.2.1	<p>The VFA Agent is required to upload and attach the Issuer's Whitepaper (.pdf format in colour).</p>
G3-3.3.2.2	<p>The VFA Agent is then required to download, populate and upload Annex 1 to the Whitepaper Registration Form (.xlsm format).</p>
<i>Sub-Section 3</i>	<i>Section C: Systems Audit</i>
G3-3.3.3.1	<p>The VFA Agent is required to indicate the type of Systems Audit carried out, distinguishing between a Type 1 Systems Audit or Type 2 Systems Audit.</p>

The VFA Agent is required to upload and attach the Systems Audit Report and the Systems Auditor Opinion (.pdf format in colour).

- G3-3.3.3.2 In cases where the appointment of a Systems Auditor and/or the Systems Audit is still pending as at the date of the submission, the Applicant is **requested to mark the type of Systems Audit as "N/A" and submit the following through the Chatbox Function as soon as the Applicant is in receipt of such information/documentation: (i) Type of Systems Audit carried out; (ii) Systems Auditor's Opinion; and (iii) Systems Auditor's Report.**

Section 4 *Application Fees and Declaration Form*

Sub-Section 1 *Section A: Payment of Application Fees*

- G3-3.4.1.1 The Authority shall not commence the review of an application which has pending fees.

- G3-3.4.1.2 Pursuant to G3-3.4.1.1., payment of the non-refundable Application Fees may be made either through (i) cheque, which should be made payable to **the "MFSA" or "Malta Financial Services Authority", or (ii) bank transfer using either of the following details:**

- i. Bank of Valletta plc

<i>Address:</i>	229, Fleur-De-Lys Road, Birkirkara BKR9069, Malta
<i>Account Number:</i>	15803811041
<i>IBAN:</i>	MT06VALL22013000000015803811041
<i>BIC:</i>	VALL MT MT

- ii. HSBC Bank Malta plc

<i>Address:</i>	1, Naxxar Road, Birkirkara BKR 9049, Malta
<i>Account Number:</i>	027070457001
<i>IBAN:</i>	MT64MMEB44277000000027070457001
<i>BIC:</i>	MMEB MT MT

- G3-3.4.1.3 The following details are required to be inserted by the VFA Agent within the Whitepaper Registration Form:

- i. Payment Method;
- ii. Bank;

- iii. Payment Reference Number (cheque reference number for fees paid by cheque or transaction reference number for bank transfers); and
- iv. Payment Date.

Sub-Section 2 Section B: Declaration Form

G2-3.4.2.1 The VFA Agent is required to download and print Annex 2 to the Whitepaper Registration Form. The Annex should be signed by the Designated Person identified within Section A of the Whitepaper Registration Form and two representatives of the Applicant, which include (i) Administrator/s, (ii) judicial representative/s and/or (iii) other Duly Authorised Representative/s. The VFA Agent should proceed to upload and attach the Annex to the Application in .pdf format.

G2-3.4.2.2 The VFA Agent is required to Agree with the Declaration at the end of the Whitepaper Registration Form and proceed to submit.

Title 4 Considerations for Stage Two of the Whitepaper Registration Form

Section 1 Scope and application

G3-4.1.1 This Title outlines Stage Two of the Whitepaper Registration Form, and the respective requirements.

G3-4.1.2 Pursuant to G3-2.3.2 the VFA Agent can proceed to Stage Two of the Whitepaper Registration Form subsequent to the preliminary review and given that the Authority issued a permission to proceed.

Section 2 Part 4: Organisational Structure

Sub-Section 1 Section A: General

G3-4.2.1.1 **The VFA Agent is required to provide the Applicant's organisational chart** reflecting clearly both the Qualifying Unitholding structure and the Underlying group structure. The organisational chart shall clearly depict the hierarchical setup including the percentage Unitholding of all the Unitholders up to the ultimate Beneficial Owner.

Sub-Section 2 Section B: Regulatory History

G3-4.2.2.1 **The VFA Agent is required to disclose whether the Applicant's Entity ever** sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority

Sub-Section 3 Section C: VFA Agent Assessment

G3-4.2.3.1 The VFA Agent is required to (i) confirm that the Applicant is fit and proper to offer VFAs to the public and (ii) attach the collective fitness and **properness assessment conducted on the Applicant's entity.**

Section 3 Part 5: Beneficial Owners and Qualifying Unitholders

Sub-Section 1 Section A: Beneficial Owners and Qualifying Unitholders

G3-4.3.1.1 **The VFA Agent is requested to disclose the respective Applicant's Beneficial** Owners and Qualifying Shareholders by indicating (i) their position, (ii) method of holding (iii) the aggregate percentage of holding or Control.

G3-4.3.1.2 Pursuant to G3-4.3.1.1 the VFA Agent is required to specify any arrangements through which control is being maintained.

Sub-Section 2 Part B: Regulatory History

G3-4.3.2.1 The VFA Agent is required to disclose whether the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority.

Sub-Section 3 Part C: VFA Agent Assessment

G3-4.3.3.1 The VFA Agent is required to (i) confirm that the Person is fit and proper (ii) attach the fitness and properness assessment conducted on the Person.

Section 4 Part 6: Internal Governance

*Sub-Section 1 **Part A: Administrator's Details***

G3-4.4.1.1 In accordance with R2-2.2.1.2 of Chapter 2 of the Virtual Financial Assets Rulebook, the VFA Agent is required to put forward at least two (2) Administrators who shall be directing and managing the offering of the Virtual Financial Assets.

G3-4.4.1.2 The above are to be disclosed in this Section, **depicting the entity's internal** hierarchical structure as specified in Chapter 2 of the VFA Rulebook.

Sub-Section 2 Part B: Regulatory History

G3-4.4.2.1 The VFA Agent is required to disclose whether the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority.

Sub-Section 3 Part C: VFA Agent Assessment

G3-4.4.3.1 The VFA Agent is required to (i) confirm that the Person is fit and proper (ii) attach the fitness and properness assessment conducted on the Person.

Section 5 Part 7: Functionaries

G3-4.5.1 The VFA Agent is required to disclose, as In accordance with R2-2.4.1.1 of **Chapter 2 of the Virtual Financial Assets Rulebook, the Applicant's** functionaries being (i) Systems Auditor (ii) VFA Agent (iii) Custodian (iv)

Auditor (v) Money Laundering Reporting Officer, which have to be in place at all times.

G3-4.5.2 Pursuant to G3-4.5.1, custody of Virtual Financial Assets may be performed through the use of an Innovative Technology Arrangement which is duly certified by a Systems Auditor.

G3-4.5.3 **Additionally, the VFA agent is required to provide the following Applicant's details where applicable, (i) Regulatory History, (ii) VFA Agent agrees that the Person is fit and proper together with the assessment conducted on the Person (iii) letter of engagement.**

ANNEX 4

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
PART 1 – ENTITY DETAILS					
Section A VFA Agent Details <i>Designated Person</i>	P1-1	Name	Text	AP	
	P1-2	Surname	Text	AP	
	P1-3	Designated VFA Agent Contact Email	Text	AP	
Section A VFA Agent Details <i>VFA Agent</i>	P1-4	Entity Registration Number	Text	M	
	P1-5	VFA Agent Entity Name	Text	M	
Section B <i>Applicant Details</i>	P1-6	Entity Registered Name	Text	M	
	P1-7	Is the entity's Trade Name different than the Registered Name?	List	M	Select "Yes" or "No"
	P1-8	Entity trade Name/s	Text	O	If applicable, please provide the respective Trading Name
	P1-9	Legal Form	List	M	
	P1-10	Other Legal Form	Text	O	Only applicable if 'Other (Please Specify)' for Legal Form has been chosen

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P1-11	Entity Registration Number	Text	O	For entities which are not registered yet, are to disclose this field as 'N/A'
	P1-12	Date of Registration	List	O	For entities which are not registered yet, are to leave this field blank
	P1-13	Registered Address	Text	M	
	P1-13.1	Building Name/Number	Text	M	
	P1-13.2	Street	Text	M	
	P1-13.3	City/Town	Text	M	
	P1-13.4	Malta	Text	M	
	P1-13.5	Post Code/Zip Code	Text	M	
	P1-14	Business Telephone Number	Text	M	Please also include the country's extension number
	P1-15	Business Mobile Number	Text	M	Please also include the country's extension number
	P1-16	Business Email Address	Text	M	
	P1-17	Is the Business Address different than the Registered Address?	List	M	Select "Yes" or "No" If Yes, indicate the principle in place of business as required.

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P1-18	Registered Address	Text	O	
	P1-18.1	Building Name/Number	Text	O	
	P1-18.2	Street	Text	O	
	P1-18.3	City/Town	Text	O	
	P1-18.4	Malta	Text	O	
	P1-18.5	Post Code/Zip Code	Text	O	
	P1-19	Website	Text	M	
	P1-20	Social Media	Text	O	If applicable, provide the respective URL.
Section C <i>Applicant Accounting Details</i>	P1-21	Date of the company's Financial Year End	List	M	Please disclose entity's financial year end
	P1-22	Reporting Currency	List	M	Please disclose entity's financial year end
Section D <i>Applicant Formation Evidence</i>	P1-23	Memorandum and Articles of Association or any other constitutional documents	PDF Upload	M	Refer to Guidelines G3-3.2.4.1
	P1-24	Board Resolution or, in the case where the entity's Legal Form is not a company, a document indicating agreement to apply for registration of the Whitepaper	PDF Upload	M	Refer to Guidelines G3-3.2.4.1

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
PART 2 – VIRTUAL FINANCIAL ASSET DETAILS AND WHITEPAPER DETAILS					
Section A <i>Financial Instrument Test</i>	P2-1	The determination of the Financial Instrument Test indicates that the DLT Asset is a Virtual Financial Asset as termed under the Virtual Financial Assets Act (Chapter 590 of the Laws of Malta)	Tick box	M	
	P2-2	Kindly upload the Financial Instrument Test	.XLSM Upload	M	
	P2-3	Kindly upload the Declarations Sheet of the Financial Instrument Test duly signed by the Issuer and endorsed by the VGA Agent	PDF Upload	M	
Section B <i>Whitepaper Details</i>	P2-4	Please upload a copy of the Issuer's Whitepaper	PDF Upload	M	
	P2-5	Please download Annex 1 of the Whitepaper Registration Form from the link provided below and upload (.xism format)	XLSM Upload	M	
Section C <i>Systems Audit</i>	P2-6	Kindly indicate type of Systems Audit carried out	Radio Button	M	Refer to Guidelines 3-3.3.3.1
	P2-7	I Agree	Tick Box	O	Refer to Guidelines 3-3.3.3.2
	P2-8	Kindly upload the Systems Audit Report	PDF Upload	O	Refer to Guidelines 3-3.3.3.2

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
PART 3 – APPLICATION FEES AND DECLARATION FORM					
Section A <i>Payment of Application Fees</i>	P3-1	Payment Method	List	M	
	P3-2	Bank	Text	M	
	P3-3	Payment Reference Number	Text	M	
	P3-4	Payment date	List	M	
Section B <i>Declaration</i>	P3-5	Please download Annex 2 of the Whitepaper Registration Form from the link provided below and attach a signed copy (in blue link) in PDF format	PDF Upload	M	Refer to Guidelines G3-2.5.3.2
	P3-6	I Agree	Tick Box	M	

PART 4 – ORGANISATIONAL STRUCTURE

Section A <i>General</i>	P4-1	Please attach an Organisational Chart reflecting the Qualifying Unitholding Structure and the Underlying Group Structure of the Issuer in PDF format.	PDF Upload	M	
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WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
Section B <i>Regulatory History</i>	P4-2	Has the Entity Ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority?	List	M	Select "Yes" or "No"
	P4-3	Competent Authority	List	M	
	P4-4	Type of Authorisation or Licence	Text	M	
	P4-5	Status	List	M	
	P4-6	Reason	Text	O	
	P4-7	Date (applicable to the Status)	List	M	
	Section C <i>VFA Agent Assessment</i>	P4-8	I Agree	Tick box	M
P4-9		Kindly upload the collective fitness and properness assessment conducted on the Issuer's Entity	PDF Upload	M	

PART 5 – BENEFICIAL OWNERS AND QUALIFYING UNITHOLDERS

Section A	P5-1	Position	List	M	
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WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
<i>Beneficial Owners and Qualifying Unitholders</i>	P5-2	Method of holding	List	M	
	P5-3	Aggregate Percentage of Holding or Control (%)	Number	M	
<i>Section A Beneficial Owners and Qualifying Unitholders Beneficial Owner</i>	P5-4	Kindly specify any other arrangements through which control is being maintained?	Text	M	
	P5-4.1	Title	List	M	
	P5-4.2	Name	Text	M	
	P5-4.3	Maiden Name	Text	O	
	P5-4.4	Surname	Text	M	
	P5-4.5	Date of Birth	List	M	
	P5-4.6	Identification Type	List	M	
	P5-4.7	Identification Number	Text	M	
	P5-4.8	Country of Nationality	List	M	
P5-4.9	Registered address	Text	M		

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P5-4.9.1	Street	Text	M	
	P5-4.9.2	City/Town	Text	M	
	P5-4.9.3	Post Code/Zip Code	Text	M	
	P5-4.10	Business Telephone Number	Text	M	
	P5-4.11	Business Mobile Number	Text	M	
	P5-4.12	Business Email Address	Text	M	
Section A <i>Beneficial Owners and Qualifying Unitholders Qualifying Shareholder</i>	P5-5	Person Type	List	M	
	P5-6	Entity Registered Name	Text	M	
	P5-6.1	Legal Form	List	M	
	P5-6.2	Entity Registration Number	Text	M	
	P5-6.3	Date of Registration	List	M	
	P5-6.4	Registered Address	Text	M	
	P5-6.4.1	Street	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P5-6.4.2	City/Town	Text	M	
	P5-6.4.3	Post Code/Zip Code	Text	M	
	P5-6.5	Country of Registration	List	M	
	P5-6.6	Business Telephone Number	Text	M	
	P5-6.7	Business Mobile Number	Text	M	
	P5-6.8	Business Email Address	Text	M	
	P5-7	Title	List	M	
	P5-7.1	Name	Text	M	
	P5-7.2	Maiden Name	Text	O	
	P5-7.3	Surname	Text	M	
	P5-7.4	Date of Birth	List	M	
	P5-7.5	Identification Type	List	M	
	P5-7.6	Country of Nationality	List	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P5-7.7	Registered Address	Text	M	
	P5-7.7.1	Street	Text	M	
	P5-7.7.2	City/Town	Text	M	
	P5-7.7.3	Post Code/Zip Code	Text	M	
	P5-7.8	Business Telephone Number	Text	M	
	P5-7.9	Business Mobile Number	Text	M	
	P5-7.10	Business Email Address	Text	M	
Section B <i>Regulatory History</i>	P5-8	Has the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority?	List	M	Select "Yes" or "No"
	P5-9	Competent Authority	List	M	
	P5-10	Type of Authorisation or Licence	Text	M	
	P5-11	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P5-12	Reason	Text	O	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P5-13	Date	List	O	
Section C <i>VFA Agent Assessment</i>	P5-14	I Agree	Tick Box	M	
	P5-15	Kindly upload the fitness and properness assessment conducted on the Person	PDF Upload	M	

PART 6 – INTERNAL GOVERNANCE

Section A <i>Administrator's Details</i>	P6-1	Position	List	M	
	P6-2	Executive / Non-Executive	List	M	
	P6-3	Job Description	Text	M	
	P6-4	Person Type	List	M	
	P6-5	Entity Registered Name	Text	M	
	P6-5.1	Legal Form	List	M	
	P6-5.2	Entity Registration Number	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P6-5.3	Date of Registration	List	M	
	P6-5.4	Registered Address	Text	M	
	P6-5.4.1	Street	Text	M	
	P6-5.4.2	City/Town	Text	M	
	P6-5.4.3	Post Code/Zip Code	Text	M	
	P6-5.5	Country of Registration	List	M	
	P6-5.6	Business Telephone Number	Text	M	
	P6-5.7	Business Mobile Number	Text	M	
	P6-5.8	Business Email Address	Text	M	
	P6-6	Title	List	M	
	P6-6.1	Name	Text	M	
	P6-6.2	Maiden Name	Text	O	
	P6-6.3	Surname	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P6-6.4	Date of Birth	List	M	
	P6-6.5	Identification Type	List	M	
	P6-6.6	Identification Number	Text	M	
	P6-6.7	Country of Nationality	List	M	
	P6-6.8	Registered Address	Text	M	
	P6-6.8.1	Street	Text	M	
	P6-6.8.2	City/Town	Text	M	
	P6-6.8.3	Post Code/Zip Code	Text	M	
	P6-6.9	Business Telephone Number	Text	M	
	P6-6.10	Business Mobile Number	Text	M	
	P6-6.11	Business Email Address	Text	M	
	P6-7	Job Title	Text	M	
	P6-8	Job Description	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P6-9	Title	List	M	
	P6-9.1	Name	Text	M	
	P6-9.2	Maiden Name	Text	M	
	P6-9.3	Surname	Text	M	
	P6-9.4	Date of Birth	List	M	
	P6-9.5	Identification Type	List	M	
	P6-9.6	Identification Number	Text	M	
	P6-9.7	Country of Nationality	List	M	
	P6-9.8	Registered Address	Text	M	
	P6-9.8.1	Street	Text	M	
	P6-9.8.2	City/Town	Text	M	
	P6-9.8.3	Post Code/Zip Code	Text	M	
	P6-9.9	Business Telephone Number	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P6-9.10	Business Mobile Number	Text	M	
	P6-9.11	Business Email Address	Text	M	
Section B <i>Regulatory History</i>	P6-10	Has the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority?	List	M	Select "Yes" or "No"
	P6-11	Competent Authority	List	M	
	P6-12	Type of Authorisation or Licence	Text	M	
	P6-13	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P6-14	Reason	Text	O	
	P6-15	Date	List	O	
Section C <i>VFA Agent Assessment</i>	P6-16	I Agree	Tick Box	M	
	P6-17	Kindly upload the fitness and properness assessment conducted on the Person	PDF Upload	M	

PART 7 – FUNCTIONARIES

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
Section A <i>Functionaries Details</i>	P7-1	Position	List	M	
	P7-2	Registered by MDIA?	List	M	
Section A <i>Functionaries Details Registered by MDIA</i>	P7-3	MDIA Registration Number	Text	O	
	P7-3.1	System Auditor Registered Name	Text	O	
	P7-3.2	Business Telephone Number	Text	O	
	P7-3.3	Business Mobile Number	Text	O	
	P7-3.4	Business Email Address	Text	O	
	P7-4	Person Type	List	M	
Section A <i>Functionaries Details Not Registered – Legal Person</i>	P7-5	Entity Registered Name	Text	M	
	P7-5.1	Legal Form	List	M	
	P7-5.2	Entity Registration Number	Text	M	
	P7-5.3	Date of Registration	List	M	
	P7-5.4	Registered Address	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-5.4.1	Street	Text	M	
	P7-5.4.2	City/Town	Text	M	
	P7-5.4.3	Post Code/Zip Code	Text	M	
	P7-5.5	Country of Registration	List	M	
	P7-5.6	Business Telephone Number	Text	M	
	P7-5.7	Business Mobile Number	Text	M	
	P7-5.8	Business Email Address	Text	M	
Section A <i>Functionaries Details Not Registered – Natural Person</i>	P7-6	Title	List	M	
	P7-6.1	Name	Text	M	
	P7-6.2	Maiden Name	Text	O	
	P7-6.3	Surname	Text	M	
	P7-6.4	Date of Birth	List	M	
	P7-6.5	Identification Type	List	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-6.6	Identification Number	Text	M	
	P7-6.7	Country of Nationality	List	M	
	P7-6.8	Registered Address	Text	M	
	P7-6.8.1	Street	Text	M	
	P7-6.8.2	City/Town	Text	M	
	P7-6.8.3	Post Code/Zip Code	Text	M	
	P7-6.9	Business Telephone Number	Text	M	
	P7-6.10	Business Mobile Number	Text	M	
	P7-6.11	Business Email Address	Text	M	
	P7-7	Kindly Attach Letter of Engagement	PDF Upload	M	
	P7-8	Custodian Type	List	M	
	P7-9	The type of Custodian entrusted with the safekeeping of the Issuer's assets and investors' funds in relation to Virtual	List	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
		Financial Assets, is a third party who shall be:			
Section A <i>Functionaries Details</i> <i>Custodian – VFA – Option 1</i>	P7-10	Entity Registered Name	Text	M	The following is applicable both for the first and second option of type of Custody
	P7-10.1	Legal Form	List	M	
	P7-10.2	Entity Registration Number	Text	M	
	P7-10.3	Date of Registration	List	M	
	P7-10.4	Registered Address	Text	M	
	P7-10.4.1	Street	Text	M	
	P7-10.4.2	City/Town	Text	M	
	P7-10.4.3	Post Code/Zip Code	Text	M	
	P7-10.5	Country of Registration	List	M	
	P7-10.6	Business Telephone Number	Text	M	
	P7-10.7	Business Mobile Number	Text	M	
P7-10.8	Business Email Address	Text	M		

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-10.9	Has the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority?	List	M	Select "Yes" or "No"
	P7-10.10	Competent Authority	List	M	
	P7-10.11	Type of Authorisation or Licence	Text	M	
	P7-10.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-10.13	Reason	Text	O	
	P7-10.14	Date	List	O	
Section A <i>Functionaries Details Custodian – VFA – Option 2</i>	P7-11	Entity Registered Name	Text	M	The following is applicable both for the first and second option of type of Custody
	P7-11.1	Legal Form	List	M	
	P7-11.2	Entity Registration Number	Text	M	
	P7-11.3	Date of Registration	List	M	
	P7-11.4	Registered Address	Text	M	
	P7-11.4.1	Street	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-11.4.2	City/Town	Text	M	
	P7-11.4.3	Post Code/Zip Code	Text	M	
	P7-11.5	Country of Registration	List	M	
	P7-11.6	Business Telephone Number	Text	M	
	P7-11.7	Business Mobile Number	Text	M	
	P7-11.8	Business Email Address	Text	M	
	P7- 11.9	Has the Person ever sought any kind of authorisation whatsoever by the MFSA or any other Regulatory Authority?	List	M	Select "Yes" or "No"
	P7-11.10	Competent Authority	List	M	
	P7-11.11	Type of Authorisation or Licence	Text	M	
	P7-11.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-11.13	Reason	Text	O	
	P7-11.14	Date	List	O	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
Section A <i>Functionaries Details</i> <i>Custodian – VFA – Option 3</i>	P7-12	Is the Innovative Technology Arrangement being used for the purposes of custody of Virtual Financial Assets certified by a Systems Auditor?	Check box	M	
	P7-13	The type of Custodian entrusted with the safekeeping of the Issuer's assets and investors' funds in relation to Virtual Financial Assets, is a third party who shall be:	List	M	
Section A <i>Functionaries Details</i> <i>Custodian – Fiat Currency – Option 1</i>	P7-14	Entity Registered Name	Text	M	
	P7-14.1	Legal Form	List	M	
	P7-14.2	Entity Registration Number	Text	M	
	P7-14.3	Date of Registration	List	M	
	P7-14.4	Registered Address	Text	M	
	P7-14.4.1	Street	Text	M	
	P7-14.4.2	City/Town	Text	M	
	P7-14.4.3	Post Code/Zip Code	Text	M	
P7-14.5	Country of Registration	List	M		

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-14.6	Business Telephone Number	Text	M	
	P7-14.7	Business Mobile Number	Text	M	
	P7-14.8	Business Email Address	Text	M	
Section A <i>Functionaries Details Custodian – Fiat Currency – Option 2</i>	P7-15	Entity Registered Name	Text	M	
	P7-15.1	Legal Form	List	M	
	P7-15.2	Entity Registration Number	Text	M	
	P7-15.3	Date of Registration	List	M	
	P7-15.4	Registered Address	Text	M	
	P7-15.4.1	Street	Text	M	
	P7-15.4.2	City/Town	Text	M	
	P7-15.4.3	Post Code/Zip Code	Text	M	
	P7-15.5	Country of Registration	List	M	
	P7-15.6	Business Telephone Number	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-15.7	Business Mobile Number	Text	M	
	P7-15.8	Business Email Address	Text	M	
	P7-15.9	Kindly provide details of the person's regulatory history, if applicable	List	M	Select "Yes" or "No"
	P7-15.10	Competent Authority	List	M	
	P7-15.11	Type of Authorisation or Licence	Text	M	
	P7-15.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-15.13	Reason	Text	O	
	P7-15.14	Date	List	O	
Section A <i>Functionaries Details Custodian – Fiat Currency – Option 3</i>	P7-15	Entity Registered Name	Text	M	
	P7-15.1	Legal Form	List	M	
	P7-15.2	Entity Registration Number	Text	M	
	P7-15.3	Date of Registration	List	M	
	P7-15.4	Registered Address	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-15.4.1	Street	Text	M	
	P7-15.4.2	City/Town	Text	M	
	P7-15.4.3	Post Code/Zip Code	Text	M	
	P7-15.5	Country of Registration	List	M	
	P7-15.6	Business Telephone Number	Text	M	
	P7-15.7	Business Mobile Number	Text	M	
	P7-15.8	Business Email Address	Text	M	
	P7-15.9	Kindly provide details of the person's regulatory history, if applicable	List	M	Select "Yes" or "No"
	P7-15.10	Competent Authority	List	M	
	P7-15.11	Type of Authorisation or Licence	Text	M	
	P7-15.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-15.13	Reason	Text	O	
	P7-15.14	Date	List	O	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
Section A <i>Functionaries Details</i> <i>Custodian – Fiat Currency – Option 4</i>	P7-16	Entity Registered Name	Text	M	
	P7-16.1	Legal Form	List	M	
	P7-16.2	Entity Registration Number	Text	M	
	P7-16.3	Date of Registration	List	M	
	P7-16.4	Registered Address	Text	M	
	P7-16.4.1	Street	Text	M	
	P7-16.4.2	City/Town	Text	M	
	P7-16.4.3	Post Code/Zip Code	Text	M	
	P7-16.5	Country of Registration	List	M	
	P7-16.6	Business Telephone Number	Text	M	
	P7-16.7	Business Mobile Number	Text	M	
	P7-16.8	Business Email Address	Text	M	
P7-16.9	Kindly provide details of the person's regulatory history, if applicable	List	M	Select "Yes" or "No"	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-16.10	Competent Authority	List	M	
	P7-16.11	Type of Authorisation or Licence	Text	M	
	P7-16.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-16.13	Reason	Text	O	
	P7-16.14	Date	List	O	
Section A <i>Functionaries Details Custodian – Fiat Currency – Option 5</i>	P7-17	Entity Registered Name	Text	M	
	P7-17.1	Legal Form	List	M	
	P7-17.2	Entity Registration Number	Text	M	
	P7-17.3	Date of Registration	List	M	
	P7-17.4	Registered Address	Text	M	
	P7-17.4.1	Street	Text	M	
	P7-17.4.2	City/Town	Text	M	
	P7-17.4.3	Post Code/Zip Code	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-17.5	Country of Registration	List	M	
	P7-17.6	Business Telephone Number	Text	M	
	P7-17.7	Business Mobile Number	Text	M	
	P7-17.8	Business Email Address	Text	M	
	P7-17.9	Kindly provide details of the person's regulatory history, if applicable	List	M	Select "Yes" or "No"
	P7-17.10	Competent Authority	List	M	
	P7-17.11	Type of Authorisation or Licence	Text	M	
	P7-17.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other
	P7-17.13	Reason	Text	O	
	P7-17.14	Date	List	O	
Section A <i>Functionaries Details Custodian – Fiat Currency – Option 6</i>	P7-18	Entity Registered Name	Text	M	
	P7-18.1	Legal Form	List	M	
	P7-18.2	Entity Registration Number	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-18.3	Date of Registration	List	M	
	P7-18.4	Registered Address	Text	M	
	P7-18.4.1	Street	Text	M	
	P7-18.4.2	City/Town	Text	M	
	P7-18.4.3	Post Code/Zip Code	Text	M	
	P7-18.5	Country of Registration	List	M	
	P7-18.6	Business Telephone Number	Text	M	
	P7-18.7	Business Mobile Number	Text	M	
	P7-18.8	Business Email Address	Text	M	
	P7-18.9	Kindly provide details of the person's regulatory history, if applicable	List	M	Select "Yes" or "No"
	P7-18.10	Competent Authority	List	M	
	P7-18.11	Type of Authorisation or Licence	Text	M	
	P7-18.12	Status	List	M	Refers to the Status of Licence/Approval/Registration/Position/Other

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-18.13	Reason	Text	O	
	P7-18.14	Date	List	O	
Section A <i>Functionaries Details Auditor</i>	P7-19	Entity Registered Name	Text	M	
	P7-19	Legal Form	List	M	
	P7-19.1	Entity Registration Number	Text	M	
	P7-19.2	Date of Registration	List	M	
	P7-19.3	Registered Address	Text	M	
	P7-19.3.1	Street	Text	M	
	P7-19.3.2	City/Town	Text	M	
	P7-19.3.3	Post Code/Zip Code	Text	M	
	P7-19.4	Country of Registration	List	M	
	P7-19.5	Business Telephone Number	Text	M	
P7-19.6	Business Mobile Number	Text	M		

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-19.7	Business Email Address	Text	M	
	P7-19.8	Kindly Attach letter of engagement (.pdf format)	Text	M	
Section A <i>Functionaries Details</i> <i>Auditor</i>	P7-20	Title	List	M	
	P7-20.1	Name	Text	M	
	P7-20.2	Maiden Name	Text	M	
	P7-20.3	Surname	Text	M	
	P7-20.4	Date of Birth	List	M	
	P7-20.5	Identification Type	List	M	
	P7-20.6	Identification Number	Text	M	
	P7-20.7	Country of Nationality	List	M	
	P7-20.8	Registered Address	Text	M	
	P7-20.8.1	Street	Text	M	
	P7-20.8.2	City/Town	Text	M	

WHITEPAPER REGISTRATION FORM FIELD DETAILS

Sheet ref.	Field Code	Required Detail	Field Type	REQ ^[1]	Details
	P7-20.8.3	Post Code/Zip Code	Text	M	
	P7-20.9	Business Telephone Number	Text	M	
	P7-20.10	Business Mobile Number	Text	M	
	P7-20.11	Business Email Address	Text	M	

Notes:

- [1] 'M' refers to mandatory input (as applicable)
'O' refers to optional input.

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