



MiCAR Licensing

Europe





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What is MiCAR?

MiCA establishes EU-wide framework for crypto-assets service providers (also known as crypto- assets service providers - CASPs) and crypto assets (also known as virtual currencies or cryptocurrencies). It covers issue rules for certain crypto assets, including virtual currencies backed by fiat currencies or other assets, and e-money based on distributed ledger (blockchain) technology. Regulation established continues the approach chosen by EU to fit for the digital age and contributes to a future-ready economy that works for the people, including by enabling the use of innovative technologies. Crypto assets will play significant role in the further capital-raising processes, by provision of innovative way of financing for enterprises and ideas. There's also important role of crypto assets as means of payments, due to options to build cheaper, faster and more efficient systems for value transfer (incl. cross-border transfers) with lesser involvement of intermediaries. MiCA also shall stimulate companies working in blockchain technology sector for expanding their business models and crypto-asset sector itself, which will lead to economic growth and new employment opportunities for EU citizens.



Requirements and activities covered by the CASP license

The MiCAR defines three classes of CASPs divided by the minimum required amount of share capital. Each class encompasses a different range of operational capabilities for the CASP.

Share capital requirements	Crypto-asset service under MiCAR	Short description of service criteria	Examples of services
50 000€	The provision of advice on crypto assets	Allows to provide information (advice) on transactions with crypto assets, e. g. provide personalized recommendations Crypto-Assets shall remain in client or third party's possession and CASP can't make transactions according to recommendations given	<ul style="list-style-type: none"> Investment signals providers (incl. arbitrage) Investment advisors (incl. paid channels in Telegram, etc.)
	Portfolio management of crypto assets	Allows to make transaction with crypto assets for investment purposes on behalf of the client Crypto-Assets shall remain in client or third party's possession, but CASP can make transactions with these crypto-assets	<ul style="list-style-type: none"> Non-adjustable trading bots integrated within the third-party CASP platform Asset managers
	Placing of crypto assets (Listing)	Allows to offer crypto assets issued by the client to third parties	<ul style="list-style-type: none"> Marketing agencies CASPs which intend to list new tokens Entities which intend to market their token by themselves
	The reception or transmission of orders	Allows to receive and transfer orders for exchange and purchase of crypto assets with third parties on behalf of the client, e. g. to MTF or Exchange service provider Crypto-Assets shall remain in client or third party's possession and CASP can't fulfill orders by making transactions with these crypto-assets	<ul style="list-style-type: none"> Order aggregators B2bB solutions for liquidity providers/market makers
	Transfer of crypto-assets	Allows to transfer crypto assets by client's request, incl. on certain conditions	<ul style="list-style-type: none"> Crypto acquiring Escrow p2p exchanges smart contracts for cross-chain crypto transfer custody wallets exchanges (allowing to hold crypto on them, e.g. for making further exchanges)
	Execution of orders for crypto assets on behalf of clients	Allows to execute orders for exchange and purchase of crypto assets with third parties on behalf of the client (incl. through MTF, OTC and between existing orders of customers) Crypto-Assets shall remain in client or third party's possession, but CASP can fulfill orders by making transactions with these crypto-assets	<ul style="list-style-type: none"> Crypto Exchanges connected to third-party MTF or other dealing with client account (mostly with together with custody & transfer services) DEX-s and some smart contracts
125 000€	Exchanging crypto-assets for funds and/or other crypto-assets	Allows to exchange crypto assets NB! CASP shall be party of exchange transaction, otherwise it is MTF or orders executor/intermediary as defined above	<ul style="list-style-type: none"> Crypto-ATM Exchanges dealing with own account Crypto acquiring (with option to pay in fiat)
	Custody and administration of crypto assets	Allows to receive and hold client's crypto assets, but not to transfer them. Client may receive their crypto assets by receiving private key of the wallet from such CASP or some other way	<ul style="list-style-type: none"> Custody Solutions for other CASPs Any other companies (exchanges, custodial wallet, escrow, crypto acquiring, crypto brokers etc), which want to receive and hold client's crypto assets
150 000€	Operation of a multilateral trading facility (MTF) for crypto-assets brokerage	Allows to manage MTF where client orders for buy and sell crypto assets can be matched	<ul style="list-style-type: none"> Crypto Exchanges with their own infrastructure for orders matching Providers of technological solutions for other CASPs DEX-s
Services not covered by MiCAR		Any service, which can't be qualified according to aforementioned criteria	<ul style="list-style-type: none"> Any entities dealing with security tokens (investment firms) Issuance of derivatives and other financial instruments on crypto assets NFT issuers and non-custodial platforms dealing with NFTs (art brokers) Staking pools (fund managers)

General CASP documentation requirements

Compliance management framework

This Policy outlines measures taken by Company to fulfill compliance obligations relating to its operations and maintains a high awareness of compliance obligations among staff and associates.

Internal governance and control framework

This framework helps the client to establish internal governance mechanisms, allowing to ensure effective management of organization, as well as fulfill regulatory requirements. In the course of this framework's implementation, the company will have understanding on positions needed (e. g. CEO and other senior managers, AML Officer, Internal Auditor, Accountant, etc.) and requirements established for such positions.

Risk management framework

During this stage the company's business shall be deeply analyzed for understanding risks which should be managed according to obligations arising from laws. Usually, companies operating in the financial field perform risk assessments for the ML/TF, operations, liquidity, credit risk, security, ICT, business continuity. For performing risk assessment might be used experts in certain field, external sources etc.

Information and communications technology (ICT) and security framework

These frameworks establish approach for usage of ICT in the course of the company's operations. ICT and their security play crucial part in operations of financial institutions and they shall be implemented in accordance with regulatory requirements, arising from EU regulations (DORA, EBA, ESMA, ISO27001 etc.)

Business continuity management framework

Outlines an organisation's approach to ensuring the resilience and continuity of its operations. This policy is designed to protect against, respond to, and recover from various disruptions (incl. ICT-related), such as cyberattacks, system failures, and other operational risks that could impact the organisation's ability to provide services.

AML/CTF and sanctions framework

This framework contains policies and procedure necessary to prevent money laundering, terrorist financing and violation of international sanctions, which may be performed through the company. It consists of procedures described above, which may constitute one or few documents, depending on complexity of the company's services and regulatory requirements.

Financial reporting framework

Accounting policy – contains specific principles and procedures based on accounting rules and implemented by a company that are used to prepare and examine the financial statements, which shall adhere to generally accepted accounting principles (GAAP) and/or international financial reporting standards (IFRS), as well as local standards

Customer relations framework

List of policies required for the interaction with customers/users of the platform contains rules on making and resolving complaints to ensure the client concerns are treated seriously and that complaints are addressed promptly and in a transparent manner.



Packages

SUPPORTING PACKAGE

10 000€

180€+VAT

Additional hours:

Includes:

- 50 hours of dedicated legal support from our lawyers

Scope of services includes flexible, expert-level guidance without providing a complete set of pre-made legal framework templates. Instead, our legal team offers tailored assistance in preparing specific documentation required for your MiCA application, based on your business needs and the hours allocated. Additional hours can be added as necessary.

Ideal for: Companies with an in-house legal department that require targeted advice or support with select regulatory frameworks and compliance procedures - particularly on an hourly consulting basis.

INITIAL PACKAGE

8 000€

Includes:

- A complete set of MiCA-compliant legal framework and internal policy templates, developed in accordance with ESMA guidelines and current regulatory requirements
- List of frameworks included upon request

Scope of services includes the delivery of raw, ready-to-customize templates designed for full compliance under MiCA regulations. Please note that this package does not include any personalized legal support or consultation from our team beyond the provision of documentation.

Ideal for: Companies or projects with an established in-house legal and compliance team capable of adapting and implementing regulatory policies independently. Perfect for businesses that prefer to handle the MiCA framework integration internally without the need for external legal assistance.

LEGAL FRAMEWORKS PACKAGE – option 1

30 000€

Includes:

- Comprehensive review of your business model and recommendations for the business plan
- Development of the following core MiCA-compliant frameworks:
 - Internal governance and control
 - Business continuity management
 - Financial reporting
 - Customer relationship management
 - Compliance management
 - Risk management
 - ICT and cybersecurity
- Supervision of policy implementation
- Integration of Travel Rule requirements into legal frameworks
- Design of a tailored employee training program
- Provision of a full set of MiCA and ESMA-aligned internal policy templates

LEGAL FRAMEWORK + INCORPORATION SUPPORT – option 2

35 000€

Includes everything in the €30,000 package, plus:

- Full company incorporation from scratch
- Assistance with opening a start-up account in a credit institution
- Support for share capital contribution
- Preparation and delivery of all required corporate documents
- Assistance with NSC (National Sanctions Checklist) screening

Scope of services include in both packages a complete suite of MiCA-compliant templates developed in line with ESMA standards. In addition to template provision, they cover the customization and adaptation of these frameworks to your specific business model. You will also receive 285 hours of legal advisory support to ensure proper implementation and alignment up to the point of application submission.

Ideal for: Start-ups and companies without a fully established legal or compliance infrastructure that require end-to-end support in developing their legal architecture, internal frameworks, and regulatory readiness. Option 2 is particularly suitable for projects starting from zero, offering full incorporation and legal setup services.

COMPLETE PACKAGE

45 000€

Includes:

- All services from the €35,000 Legal Frameworks Package, including:
 - Full legal framework development and customization
 - Company incorporation and corporate structuring
 - Start-up account opening and share capital support
 - 285 hours of legal advisory services
 - Full set of MiCA-compliant internal policy templates aligned with ESMA guidelines
- Personalized Legal & Regulatory Consulting (2 Months)
 - Weekly strategic sessions (3 hours/month)
 - Roadmap development & progress tracking
 - Ongoing guidance on application process and regulatory positioning
- HR & Compliance Support
 - Support in the recruitment and integration of one C-Level executive
 - Access to our AML Certification Platform for 3 employees (training included)
- Dedicated Project Management
 - Exclusive Project Manager assigned to your case for 2 months
 - Direct communication and coordination across legal, HR, and compliance teams
- CRM Access & Workflow Management
 - Access to our internal ClickUp platform for 3 months
 - Full transparency and real-time visibility over milestones, tasks, and team interactions

To continue receiving personalized project management and internal department support beyond the initial 2-month period, we offer flexible subscription-based extensions. Please contact us for tailored pricing.

Ideal for: Companies and projects seeking comprehensive, hands-on support through the entire MiCA licensing journey—from legal structuring and regulatory alignment to HR recruitment and application management. This is a true turn-key solution, perfect for teams looking to become fully operational as a Crypto-Asset Service Provider (CASP) with minimal internal friction and maximum coordination.

Subscription packages

LEGAL AND CONSULTING SERVICES

from **1 120€**/month

- ✓ Communication with regulators (guiding through the application process, answering their requests, asking for clarifications regarding the implementation of regulations, etc.);
- ✓ Management of certain processes (e.g., passporting, investigations, trademark registration, etc.);
- ✓ Participation in meetings regarding frameworks implemented (e.g. workshops for risk assessment, etc.);
- ✓ Drafting and amending legal documents (e.g., if the auditor asked to amend policies, contracts, etc.);
- ✓ Communication with third parties (e.g., banks, KYC/KYT providers, etc.);
- ✓ Communication with regulators (guiding through the application process, answers to their requests, asking clarifications regarding implementation of regulations, etc.);
- ✓ Answering to client's claims and ensuring proper communication;
- ✓ Search of third parties necessary for business (auditor, office, KYC/KYT provider, etc.);
- ✓ Setting up accounting software and framework for processing financial statements;
- ✓ Helping your internal (or external) accountant to understand the specifics of crypto transactions;
- ✓ Ensuring communication with auditor and tax authorities;
- ✓ Financial reporting & other reports (e.g., regulator, Statistics, counterparties);
- ✓ Bookkeeping and other accounting-related task;
- ✓ Weekly calls;
- ✓ Access to the CRM ;
- ✓ Personal project manager.

HR & TRAINING SERVICES

from **900€**/month

- ✓ Seeking for the appropriate personnel and ensuring their integration (incl finding a replacement in any case);
- ✓ Employment and unemployment of personnel
- ✓ Preparing employees for interviews with regulators during the licensing process;
- ✓ Integration of employees into the company's ecosystem,
- ✓ Payroll and declarations related thereof;
- ✓ Communication with the regulator in case of key person change.
- ✓ Employee training, including new employees, following regulatory requirements (at least annually) and the supervisory authority's expectations;
- ✓ Prepare organization-tailored training and implementation.

COMPLIANCE & IT AUDIT SERVICES

from **4 000€**/quarter

- ✓ Assisting with the risk assessment (to the extent permitted by audit standards);
- ✓ Assisting in-house employees regarding the implementation of an internal control framework; Performing regular internal
- ✓ reviews and assessing the effectiveness of the Company's processes; Performing DORA-
- ✓ related tasks: ICT risk reviews;
- ✓ Analysis of ICT incidents, analysis of 3rd party ICT service providers, building staff awareness and providing cyber security trainings, assisting in tabletop exercises, assisting in regulatory reporting.



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