Crypto-Asset Transfer Operations Procedure (v1.7)

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Tier note. This is an operational-tier document. It is deliberately outside the diagnostic's corpus (stage one reads the governing tier); it enters at stage two, where the question is whether the procedures implement what the governing tier requires. It covers the crypto-asset rail; its funds counterpart is the Payments Operations Procedure.

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Version	Date	Change
1.7	March 2026	Counterparty messaging fallback (§7.4) added
1.4	September 2025	Self-hosted address handling expanded
1.0	April 2025	Initial issue

[Intervening versions omitted]

Contents

Sections in bold are excerpted below.

[Sections 1 to 6 omitted]

7. Outbound transfer handling

7.1 The digital-asset platform (Osprey) builds the outbound transfer message when the customer instructs the transfer; travel-rule data is exchanged through the messaging channel agreed with the counterparty provider under §5.

7.2 Osprey populates the originator name and postal-address fields from the customer account record.

7.3 Before release to the network, the assembled transfer is screened against applicable sanctions lists.

7.4 Where the counterparty provider cannot receive travel-rule data through an agreed channel, the transfer is held and not released until the data has been exchanged through the fallback channel under §5; transfers to or from self-hosted addresses are handled under §6.

7.5 Release is under dual control: assembly and release are performed by different operators, and transfers above EUR 15,000 require approval by the digital-asset operations lead.

[Sections 8 onward omitted]