Transfers of Funds and Crypto-Assets Standard (v3.2)

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Version	Date	Change
3.2	March 2026	Guidance references updated
3.1	April 2025	Crypto-asset transfer requirements (§6) added
3.0	December 2024	Reissued for the application of Regulation (EU) 2023/1113; renamed from the Financial Crime Standard; monitoring and screening moved to dedicated Standards

[Earlier versions omitted]

Contents

Sections in bold are excerpted below.

1. Purpose and scope

1.1 This Standard applies to every transfer of funds and every transfer of crypto-assets that Mittenda executes or receives, and to every transfer in which it acts as an intermediary payment service provider or an intermediary crypto-asset service provider.

1.2 It gives effect to Chapters II and III of Regulation (EU) 2023/1113 and has regard to the travel rule guidelines, EBA/GL/2024/11.

2. Role determination

2.1 Mittenda's role in the chain is determined for each transfer, and the duties of that role are applied.

2.2 For transfers of funds, the roles are those of Chapter II of Regulation (EU) 2023/1113: payment service provider of the payer, payment service provider of the payee, and intermediary payment service provider. For transfers of crypto-assets, the roles are those of Chapter III: crypto-asset service provider of the originator, of the beneficiary, and intermediary crypto-asset service provider.

2.3 In this Standard, for transfers of funds, 'originator' and 'beneficiary' mean the payer and the payee.

3. Information requirements

3.1 Every transfer of funds is accompanied by information on the originator: the name; the payment account number; the address, including the name of the country, official personal document number and customer identification number or, alternatively, the date and place of birth; and, where the message format allows, the current legal entity identifier or an equivalent official identifier. The transfer is also accompanied by the beneficiary's name, payment account number and, where the format allows, legal entity identifier.

3.2 Where every payment service provider in the chain is established in the Union, the transfer is accompanied by at least the payment account numbers of the originator and the beneficiary. The full information in §3.1 is made available to the payment service provider of the payee or an intermediary payment service provider within three working days of a request.

3.3 A batch file of transfers from a single originator may carry the information in §3.1 on the batch file rather than on each transfer, provided the batch file carries it in full and each individual transfer carries the originator's payment account number.

3.4 Where a payment service provider in the chain is established outside the Union, a transfer of funds not exceeding EUR 1,000 that does not appear linked to other transfers together exceeding that amount may be accompanied by only the names and payment account numbers of the originator and the beneficiary.

3.5 Where the identity of the originator has been verified in accordance with the AML/CTF Policy §6 and the Customer Due Diligence Standard §4, the accuracy of the information required by this Standard is deemed to have been verified, in accordance with Article 4(5) and Article 14(7) of Regulation (EU) 2023/1113.

4. Incoming transfers and counterparty management

4.1 Incoming transfers are monitored for missing or incomplete information in accordance with risk-based procedures, and transfers from counterparties that repeatedly fail to provide required information are escalated to the Head of Financial Crime.

4.2 Detection procedures identify incoming transfers whose required fields are missing, incomplete, or completed with characters or inputs that do not conform to the conventions of the relevant messaging scheme.

[Section 5 omitted]

6. Crypto-asset transfer requirements

6.1 Every transfer of crypto-assets is accompanied by information on the originator: the name; the distributed ledger address or crypto-asset account number; the address, including the name of the country, official personal document number and customer identification number or, alternatively, the date and place of birth; and, where the message format allows, the current legal entity identifier or an equivalent official identifier. The transfer is also accompanied by the beneficiary's name and distributed ledger address or crypto-asset account number.

6.2 These requirements apply to every transfer of crypto-assets regardless of value: no de-minimis threshold applies.

6.3 For a transfer of more than EUR 1,000 to or from a self-hosted address, whether the address is owned or controlled by Mittenda's customer is verified.