


















Minimum Viable Controls Self-Assessment

Accounting and Financial Recordkeeping <i>(Debits and Credits documented; CFO, Department; asset paper trail)</i>	1 <input type="radio"/> What are Financial Statements?	2 <input type="radio"/>	3 <input type="radio"/> Works for us; outsiders may be perplexed	4 <input type="radio"/>	5 <input type="radio"/> Holds up to extensive third-party scrutiny
Audit <i>(Commensurate with size and risk scope; transparency, experience of auditor)</i>	1 <input type="radio"/> I audited a great music class in college	2 <input type="radio"/> GAP is a great store, very fashion-forward	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/> Top audit firm, clean GAAP audits. (CPA's GPA 4.0 in college)
Treasury Management <i>(Controls on funds flows; liquidity forecasting; reporting; banking relationships)</i>	1 <input type="radio"/> N/A- we don't have any funds to manage	2 <input type="radio"/> Funds in the bank, no cash lying around	3 <input type="radio"/>	4 <input type="radio"/>	5 <input type="radio"/> Tight-wad CFO, double signatures to buy a pack of gum...
Cybersecurity, Data Mgt and Protection <i>(Systems integrity; digital asset controls; system access limits; penetration testing; "back doors")</i>	1 <input type="radio"/> I'm really interested in this penetration testing thing	2 <input type="radio"/>	3 <input type="radio"/> We trust our smart people to not do dumb things	4 <input type="radio"/>	5 <input type="radio"/> State of the art; pass third party pen tests; no intrusions
Human Resources <i>(HR dept; experienced HR lead; maintain employee & contractor info; written roles and reporting lines)</i>	1 <input type="radio"/> Mostly rely on tech; not many humans	2 <input type="radio"/>	3 <input type="radio"/> Have an HR Director who keeps a low profile	4 <input type="radio"/>	5 <input type="radio"/> HR is relentless; established HR policies; constant education and reinforcement
Information Retention & Documentation <i>(Decision-making records; retain communication history; doc retention policies)</i>	1 <input type="radio"/> Routinely delete records - "no records, no blame, no shame"	2 <input type="radio"/>	3 <input type="radio"/> Recordkeeping policies up to department leads	4 <input type="radio"/>	5 <input type="radio"/> Digital and paper record management policies and systems in place
Governance <i>(Based on complexity and risk; active and independent Board,</i>	1 <input type="radio"/> We have token governance	2 <input type="radio"/>	3 <input type="radio"/> We know where the buck stops;	4 <input type="radio"/>	5 <input type="radio"/> Experienced management,

<i>third-party oversight (regulator, bank, investor, etc.)</i>	even have some Boomers on board				scrupulous Board; engaged investors; regulatory examination
Disclosures of Potential Conflicts of Interest <i>(Third parties, subs, affiliates; beneficial owner relationships; non-US entity oversight)</i>	1  "Don't Ask, Don't Tell"	2  We don't try to hide any conflicts of interest	3 	4 	5  Robust policy in place and required disclosures to management
Protections of Customer Assets <i>(Reserves, Asset holding/storage; pooled assets; customer rights, insurance)</i>	1  We book the assets as our own as soon as we receive them	2 	3  Assets are placed in a pooled acct and held for the benefit of the customer; our reserves vary depending on market conditions; FDIC insurance is available	4 	5  Fully reserved, segregated funds; private insurance available
Customer Disclosures <i>(Customer rights and privileges, product pricing, etc.)</i>	1  We copied our terms and conditions from FTX	2 	3  Customer rights and privileges are explained in a document cut and pasted from several regulated exchanges	4 	5  10-page Terms of Use carefully drafted by our lawyers based on current law, regulations, and best practices; updates available on our website