Sample EMI Application File

Index + Document Summary for Full EMI License Submission

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25	Business Continuity & Disaster Recovery Plan

Document Summaries

1. Cover Letter
Introduces the applicant, confirms the license type requested (EMI), and provides a checklist of enclosed documents.

2. Application Form
Official regulatory form capturing the applicant's legal details, license type, scope of activity, directors, and beneficial owners.

3. Business Plan
Detailed overview of the company's proposed EMI services, customer base, geographic scope, revenue model, and strategic roadmap.

4. Financial Projections
3–5 year profit & loss, balance sheet, and cash flow projections, including assumptions and stress-test scenarios.

5. Programme of Operations
Describes services offered under PSD2, e.g., issuance of electronic money, money remittance, payment initiation, etc.

6. Compliance Framework
Structure of the compliance department, reporting lines, regulatory obligations, and procedures for ongoing adherence.

7. AML/CFT Policy
Customer due diligence (CDD), onboarding, ongoing monitoring, PEP/sanctions checks, SARs, and training regime.

8. Corporate Governance
Outlines board composition, non-executive directors, control functions, and decision-making processes.

9. Organisational Chart
Depicts the reporting structure, key management functions, and departmental layout.

10. Safeguarding Measures
Explains how client funds will be protected — either via segregation of accounts or insurance guarantees.

11. IT & Security Infrastructure
Overview of digital infrastructure, cloud/data center usage, cybersecurity protocols, and penetration testing strategy.

12. Risk Management Policy
Operational, financial, compliance, reputational risk categories and corresponding mitigation frameworks.

13. Outsourcing Policy
Disclosure of outsourced service providers, SLAs, oversight mechanisms, and regulator approval (where required).

14. Internal Audit Plan
Self-monitoring strategy to ensure controls are functioning, including audit frequency, scope, and independence.

15. Capital Evidence
Bank statement or auditor letter confirming availability of required initial capital (min. €350,000 or equivalent).

16. Fit & Proper Declarations
Individual declarations by board members and key persons confirming clean criminal record, financial integrity, and competence.

17. CVs & Clearances
Detailed CVs of all key function holders plus police clearance (not older than 3 months), translated and apostilled if foreign.

18. Shareholder Structure
UBO chart showing full ownership chain, including all entities and natural persons.

19. Articles of Association
Governing document of the corporate entity, compliant with local corporate law and aligned with EMI operations.

20. Auditor & Counsel Engagements
Formal letters confirming appointment of auditors and external legal advisors.

21. Pre-Contractual Customer Disclosures
Drafts of user agreements, fee schedules, and key information documents in line with PSD2 and consumer protection rules.

22. Complaints Policy
Procedures for handling user complaints, response timelines, escalation channels, and record-keeping.

23. Consumer Protection Measures
Policies ensuring transparency, clear terms, and safeguarding of user rights.

24. GDPR/Data Protection
How client data will be collected, processed, stored, and protected in accordance with GDPR and local DPA rules.

25. Business Continuity Plan
Crisis management structure, failover systems, communication protocols, and resilience testing.