

# Standardized Due Diligence Questionnaire (DDQ)

1<sup>st</sup> Edition | 2025



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**No Guarantee of Outcomes.** Completing this DDQ does not guarantee regulatory compliance, operational adequacy, allocator approval, or access to capital. Allocators conduct independent due diligence and make investment decisions based on their own criteria and risk assessments.

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**Manager Responsibility.** Managers are solely responsible for the accuracy, completeness, and currency of all responses and supporting documentation. Managers must ensure responses comply with applicable laws, regulations, and contractual obligations in all relevant jurisdictions.

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**Agreement to Terms.** By completing and distributing this DDQ, managers acknowledge they have read, understood, and agreed to this disclaimer.

# USAGE INSTRUCTIONS

**General Availability.** This standardized DDQ is available to all digital asset investment managers regardless of DFSB signatory status. Any manager may adopt, complete, and distribute this DDQ to allocators, consultants, and other parties conducting operational due diligence.

## Signatory vs. Non-Signatory Usage:

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- May represent that they "utilize the DFSB Standardized Due Diligence Questionnaire in accordance with DFSB Standards"
- May display the DFSB emblem on completed DDQs, investor materials, and marketing communications
- May reference DFSB signatory status in offering documents, presentations, and correspondence

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- May NOT claim DFSB affiliation, signatory status, or endorsement
- May NOT use the DFSB emblem or logo
- May NOT represent that their operations are "in accordance with DFSB Standards"
- May acknowledge use of "the DFSB standardized DDQ format" as a factual statement

**Standardization Benefits.** This format enables managers to respond once to common operational due diligence questions rather than completing multiple proprietary DDQ formats from different allocators. Allocators benefit from consistent disclosure across managers, facilitating comparison and evaluation.

**Completion Requirements.** Managers should complete all applicable sections thoroughly and accurately, ensuring all information is current as of the stated "As-of Date" and consistent

with regulatory filings, offering documents, and marketing materials. Update responses quarterly minimum or immediately upon material changes.

**Supporting Documentation.** Completed DDQs should be accompanied by supporting documentation as outlined in Part I: Supporting Documentation Checklist. Organize materials in a secure data room with clearly labeled folders and descriptive file names.

**Allocator Use.** Allocators may use this DDQ as received from managers or may request supplemental information. Receipt of a completed DDQ does not obligate allocators to invest, engage in further diligence, or provide feedback.

**Updates and Versions.** DFSB may update this DDQ periodically to reflect market developments, regulatory changes, and evolving best practices. Managers should verify they are using the current version available at [www.dfsb.org](http://www.dfsb.org) completed DDQs accordingly. Version number and publication date appear on the cover page.

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**Questions and Support.** For questions about signatory status, proper usage, or technical assistance, contact DFSB at [info@dfsb.org](mailto:info@dfsb.org).

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## PART I: SUPPORTING DOCUMENTATION CHECKLIST

*This checklist identifies the standard documentation allocators will request during operational due diligence. Managers should organize these materials in a secure data room with clearly labeled folders matching the categories below, using descriptive file names with dates (e.g., "Compliance\_Manual\_2025Q1.pdf"). All documents must be current as of your stated "As-of Date" and updated quarterly minimum or immediately upon material changes to key personnel, service providers, regulatory status, operational incidents, investment strategy, or governance structure. Access should be granted only under NDA. Missing or outdated documentation will delay diligence and may disqualify your firm from consideration by allocators.*

### DOCUMENTATION CHECKLIST

#	Item	Status
1.0	Corporate & Legal	
1.1	Certificate of Incorporation / Formation Documents	<input type="checkbox"/>
1.2	Operating Agreement / Partnership Agreement / Articles of Association	<input type="checkbox"/>
1.3	Organizational Chart (entity structure)	<input type="checkbox"/>
1.4	Registered Shareholder List	<input type="checkbox"/>
1.5	List of Directors and Beneficial Owners	<input type="checkbox"/>
2.0	Governance & Policies	

#	Item	Status
2.1	Board Minutes or Governance Committee Records (last 2-3 meetings)	<input type="checkbox"/>
2.2	Key person and succession plan	<input type="checkbox"/>
2.3	Policy library including: <ul style="list-style-type: none"> <li>• Compliance manual</li> <li>• Valuation policy</li> <li>• Best execution policy</li> <li>• Allocation policy</li> <li>• Personal trading &amp; outside business activity (OBA) policy</li> <li>• MNPI (material non-public information) policy</li> <li>• Cybersecurity &amp; information security policy</li> <li>• BCP/DRP plans</li> <li>• AML / KYC policies and procedures</li> <li>• Proxy voting policy (if applicable)</li> <li>• Whistleblower policy</li> <li>• Records retention policy</li> </ul>	<input type="checkbox"/>
<b>3.0</b>	<b>Regulatory</b>	
3.1	Current regulatory license (SEC, FCA, VARA, etc.)	<input type="checkbox"/>
3.2	Form ADV (Parts 1, 2A, 2B)	<input type="checkbox"/>
3.3	Form PF or Annex IV (if applicable)	<input type="checkbox"/>
3.4	Regulatory correspondence, audit letters, or comment letters	<input type="checkbox"/>
3.5	Examination reports or regulatory findings (last 3 years)	<input type="checkbox"/>
<b>4.0</b>	<b>Fund and Strategy Documentation</b>	
4.1	Offering memorandum / PPM	<input type="checkbox"/>

#	Item	Status
4.2	Subscription agreement + side letter template	<input type="checkbox"/>
4.3	Legal fund structure overview (onshore/offshore entities)	<input type="checkbox"/>
4.4	Strategy overview deck (PDF or presentation)	<input type="checkbox"/>
4.5	Monthly/quarterly performance tear sheets	<input type="checkbox"/>
4.6	Gross/net return history since inception	<input type="checkbox"/>
4.7	Top 5 drawdowns with attribution analysis and recovery timeline	<input type="checkbox"/>
<b>5.0</b>	<b>Financial &amp; Audit</b>	
5.1	Most recent 2 years of audited financials (fund and manager-level)	<input type="checkbox"/>
5.2	NAV calculation process documentation	<input type="checkbox"/>
5.3	Auditor management letter (if available)	<input type="checkbox"/>
5.4	Quarterly NAV statements (last 2 years)	<input type="checkbox"/>
5.5	Fee calculation and billing methodology documentation	<input type="checkbox"/>
<b>6.0</b>	<b>Risk Management</b>	
6.1	Risk management framework or policy	<input type="checkbox"/>
6.2	Risk committee minutes (if applicable)	<input type="checkbox"/>
6.3	Leverage, liquidity, exposure limits documentation	<input type="checkbox"/>



#	Item	Status
6.4	Counterparty risk assessment documentation	<input type="checkbox"/>
6.5	Concentration limits and monitoring reports	<input type="checkbox"/>
<b>7.0</b>	<b>Trading &amp; Infrastructure</b>	
7.1	Trade Execution Policy and trade flow diagram	<input type="checkbox"/>
7.2	Prime brokerage, custody, and key trading agreements	<input type="checkbox"/>
7.3	Technology systems overview (e.g., OMS, PMS, custody stack)	<input type="checkbox"/>
7.4	Business continuity plan + failover architecture	<input type="checkbox"/>
7.5	Disaster recovery test results (last 12 months)	<input type="checkbox"/>
7.6	Wallet security architecture and key management procedures	<input type="checkbox"/>
7.7	Hot wallet vs. cold storage allocation policy	<input type="checkbox"/>
<b>8.0</b>	<b>Personnel</b>	
8.1	Bios and resumes of key investment, operations, and compliance staff	<input type="checkbox"/>
8.2	Form U4/U5 disclosures for registered personnel	<input type="checkbox"/>
8.3	Organizational chart with reporting lines	<input type="checkbox"/>
8.4	Compensation structure summary (salary vs. carry vs. equity)	<input type="checkbox"/>
<b>9.0</b>	<b>Marketing Materials</b>	

#	Item	Status
9.1	Most recent marketing deck	<input type="checkbox"/>
9.2	Sample investor letter or update	<input type="checkbox"/>
9.3	Due diligence questionnaire (DDQ) if already filled	<input type="checkbox"/>
<b>10.0</b>	<b>Insurance &amp; Legal</b>	
10.1	E&O insurance declarations page and policy limits	<input type="checkbox"/>
10.2	D&O insurance declarations	<input type="checkbox"/>
10.3	Crime/fidelity bond documentation	<input type="checkbox"/>
10.4	Cyber insurance policy	<input type="checkbox"/>
10.5	Active or threatened litigation disclosures	<input type="checkbox"/>

## PART II: PRELIMINARY MANAGER INFORMATION

*This preliminary questionnaire establishes baseline information about your firm's structure, investment strategy, operational capabilities, and service provider infrastructure for initial assessment and screening. Complete all sections accurately and thoroughly, ensuring all information is current as of your stated "As-of Date" and consistent with regulatory filings, offering documents, and marketing materials. Update this questionnaire quarterly minimum or immediately upon material changes to key personnel, service providers, regulatory status, AUM, fund terms, or operational infrastructure. Incomplete or inconsistent responses will delay evaluation and may result in disqualification from further diligence.*

### SECTION 1: FIRM INFORMATION

Question	Answer
<b>Contact Information</b>	
Main person investors should contact for due diligence	Name: Title: Email: Phone:
Principal place of business (full address)	
Additional office locations	
Website and general contact information	

Question	Answer
<b>Legal Structure</b>	
Legal name of investment manager entity	
Jurisdiction of organization/registration	
Date of formation	
Entity type (LLC, LP, Corporation, LLP, etc.)	
LEI (Legal Entity Identifier)	
<b>Ownership &amp; Control</b>	
Ownership structure and percentages	
Ultimate beneficial owners (25%+ ownership)	
Parent company/affiliates (if applicable)	
Date of any recent ownership changes	
Any planned ownership changes	

**SECTION 2: REGULATORY STATUS**

Question	Answer
<b>Registration &amp; Licensing</b>	
Regulatory status (RIA, Exempt Reporting Adviser, CFTC registered, non-U.S. equivalent)	
SEC registration number (if applicable)	
CRD number	
NFA ID (if applicable)	
Non-U.S. registrations/licenses and jurisdictions	
Date of initial registration	
Most recent Form ADV filing date (or equivalent)	
Link to public Form ADV	
<b>Regulatory History</b>	
Any regulatory examinations in past 3 years? (Yes/No)	
Any regulatory actions, sanctions, or settlements? (Yes/No)	
Any ongoing regulatory inquiries or investigations? (Yes/No)	
If yes to any: Provide details	

**SECTION 3: KEY PERSONNEL**

Question	Answer
<b>Senior Leadership</b>	
CEO/Managing Partner	Name: Title: Years at firm:
CIO/Head of Investments	Name: Title: Years at firm:
Chief Compliance Officer	Name: Title: Years at firm:
COO/Head of Operations	Name: Title: Years at firm:
<b>Investment Team</b>	
Number of portfolio managers	
Number of analysts/researchers	
Average years of industry experience	
<b>Total investment team headcount</b>	
Non-Investment Personnel	

Question	Answer
Compliance team size	
Operations team size	
Technology team size	
Total firm headcount	
<b>Key Person Risk</b>	
Identify key persons (individuals whose departure would materially impact operations)	
Succession plan in place? (Yes/No)	
Any key departures in past 12 months? (Yes/No)	

SECTION 4: ASSETS UNDER MANAGEMENT (AUM)

Question	Answer	
Current AUM		
Total firm AUM (USD)	AUM (\$)	As of Date
AUM in digital assets		
AUM by strategy (breakdown)	Strategy Name	\$
AUM by vehicle type (separate accounts, commingled funds, etc.)	Vehicle Type	\$
	Funds	
	SMA	



Question	Answer	
Number of investors/accounts	Vehicle Type	#
	Funds	
	SMAs	
AUM History		
AUM as of prior-year end (past three years)	Date	\$
	12/31/2025	
	12/31/2024	
	12/31/2023	
Largest historical AUM and date	Date	\$
Largest redemption (% and date)	Date	%
Largest subscription (% and date)	Date	%

Question	Answer	
<b>Investor Base</b>		
Institutional AUM (%)		
HNWI/Family Office AUM (%)		
Retail AUM (%)		
Geographic breakdown of investors	<b>Region</b>	<b>%</b>
	North America	
	Europe	
	Middle East	
	Asia	
	Rest of World	

SECTION 5: INVESTMENT STRATEGY

Question	Answer				
Strategy Number	#1	#2	#3	#4	#5
Strategy Overview					
Strategy Name					
Strategy Description					
Asset class focus (BTC, ETH, multi-coin, DeFi, etc.)					
Investment approach (systematic, discretionary, quant, fundamental, etc.)					
Leverage used? (Yes/No) - If yes, typical and max leverage	Y/N: Max:	Y/N: Max:	Y/N: Max:	Y/N: Max:	Y/N: Max:

## PART II: PRELIMINARY MANAGER INFORMATION

Question	Answer				
Strategy Number	#1	#2	#3	#4	#5
Use of derivatives? (Yes/No) - If yes, types	Y/N:	Y/N:	Y/N:	Y/N:	Y/N:
Strategy Details					
Strategy AUM (\$)					
Date strategy launched					
Capacity for this strategy (\$)					
Current % of capacity deployed					
Target number of positions					
Typical holding period					

## PART II: PRELIMINARY MANAGER INFORMATION

Question	Answer				
Strategy Number	#1	#2	#3	#4	#5
Expected turnover					
<b>Performance Summary</b>					
Annualized return since inception					
Best 12-month return					
Worst 12-month return					
% of positive months					
Sharpe ratio (since inception)					
Maximum drawdown					

SECTION 6: VEHICLE STRUCTURE & TERMS

Question	Answer				
Vehicle Number	#1	#2	#3	#4	#5
Investment Vehicle					
Vehicle name					
Vehicle domicile					
Vehicle structure (LP, Ltd, LLC, SMA, etc.)					
Date of first closing					
Management fee					
Performance fee/carry					

PART II: PRELIMINARY MANAGER INFORMATION

Question	Answer				
Vehicle Number	#1	#2	#3	#4	#5
Hurdle rate (if applicable)					
High water mark? (Yes/No)					
Redemption frequency					
Redemption notice period					
Lock-up period					
Gate provisions					
Side pocket provisions					
Minimum investment					

## SECTION 7: SERVICE PROVIDERS

Provider	Details
<b>Fund Administrator</b>	Name: Location: Years with firm: Contact Information:
<b>Auditor</b>	Name: Location: Years with firm: Contact Information:
<b>Custodian (Traditional Assets)</b>	Name: Location: Years with firm: Contact Information:
<b>Custodian (Digital Assets)</b>	Name: Location: Years with firm: Contact Information:
<b>Prime Broker(s)</b>	Name: Location: Years with firm: Contact Information:
<b>Legal Counsel (Onshore)</b>	Name: Location: Years with firm: Contact Information:



Provider	Details
<b>Legal Counsel (Offshore)</b>	Name: Location: Years with firm: Contact Information:
<b>Banking Relationships</b>	Name: Location: Years with firm: Contact Information:
<b>Trading Platforms/Exchanges</b>	Name: Location: Years with firm: Contact Information:
<b>Technology/ Infrastructure Providers</b>	Name: Location: Years with firm: Contact Information:
<b>Third-Party Risk Monitoring Tools</b>	Name: Location: Years with firm: Contact Information:

PART III: FULL DUE DILIGENCE QUESTIONNAIRE

*The full due diligence questionnaire assesses operational capabilities and controls across governance, risk management, technology, and investor protection in alignment with DFSB Standards 1-17. Complete all applicable sections thoroughly and accurately, ensuring responses are current as of your stated "As-of Date" and supported by documentation outlined in Part I. Update responses quarterly minimum or immediately upon material changes to governance structure, key personnel, service providers, regulatory status, operational incidents, or investment strategy. Incomplete or inconsistent responses will delay evaluation and may disqualify your firm from consideration by allocators.*

SECTION 1: GOVERNANCE & FIDUCIARY OVERSIGHT

*This section assesses compliance with DFSB Standards 1-3: Fiduciary Governance, Regulatory Compliance, and Conflicts of Interest*

#	Question	Response Type
1.1	FIDUCIARY GOVERNANCE	
1.1.1	Governance Structure	
1.1.1.1	Describe your firm's governance structure. Who has ultimate authority over operations, risk-taking, and strategic direction?	Narrative
1.1.1.2	Do you have a Board of Directors, Advisory Board, or equivalent? If yes, provide: member names, backgrounds, tenure, independence status, and meeting frequency.	Table

#	Question	Response Type
1.1.1.3	What specific expertise does your board possess relevant to digital asset investment management?	Narrative
1.1.1.4	What committees exist (Investment, Risk, Audit, Valuation, Compliance)? For each, provide: purpose, members, and meeting frequency.	Table
1.1.1.5	Provide an organizational chart showing management structure, investment team, operations, and reporting lines.	Upload
<b>1.1.2</b>	<b>Ownership and Control</b>	
1.1.2.1	Who owns your firm? Provide: ownership percentages, vesting schedules, and any ownership changes in the past 5 years.	Table
1.1.2.2	What is your firm's legal structure? Include: legal name, jurisdiction, entity type, and parent company/affiliates if applicable.	Table
1.1.2.3	Do any owners, directors, or senior personnel have interests in service providers or counterparties that create conflicts?	Narrative
<b>1.1.3</b>	<b>Policies and Procedures</b>	
1.1.3.1	Provide your complete policy library including: Compliance Manual, Code of Ethics, Valuation Policy, Best Execution Policy, Allocation Policy, Personal Trading/OBA Policy, MNPI Policy, Cybersecurity Policy, BCP/DRP, AML/KYC Policies, Whistleblower Policy, Records Retention Policy.	Upload
1.1.3.2	For each major policy, provide: date of last update, responsible party, and review frequency.	Table
1.1.3.3	How do you ensure policies remain current and are actually implemented (not just documented)?	Narrative

#	Question	Response Type
<b>1.1.4</b>	<b>Key Person Risk and Succession</b>	
1.1.4.1	Identify key persons whose departure would materially impact operations. For each, explain their role and criticality.	Table
1.1.4.2	What succession plans exist for: CEO, CIO, CCO, COO, and key portfolio managers?	Narrative
1.1.4.3	How do you mitigate key person risk through: team depth, cross-training, process documentation, and retention incentives?	Narrative
1.1.4.4	Do you maintain key person insurance? If yes, provide coverage amounts and insured individuals.	Narrative
<b>1.2</b>	<b>REGULATORY COMPLIANCE</b>	
<b>1.2.1</b>	<b>Compliance Function</b>	
1.2.1.1	Who is your CCO? Provide: name, qualifications, years of experience, and reporting line.	Narrative
1.2.1.2	Is the compliance function independent from investment personnel? How is independence maintained?	Narrative
1.2.1.3	How many compliance staff do you have? What percentage of headcount and budget is allocated to compliance?	Table
1.2.1.4	Provide your Compliance Manual. When was it last updated?	Upload
<b>1.2.2</b>	<b>Regulatory Status</b>	
1.2.2.1	What regulatory registrations do you hold? For each, provide: regulator, registration type, number, and date.	Table
1.2.2.2	Provide copies of: Form ADV (Parts 1, 2A, 2B) or non-U.S. equivalent, and Form PF or AIFMD Annex IV if applicable.	Upload

#	Question	Response Type
1.2.2.3	What exemptions or relief do you rely on? Describe legal basis and conditions.	Narrative
<b>1.2.3</b>	<b>Regulatory History</b>	
1.2.3.1	Have you been subject to regulatory examinations in the past 5 years? For each, provide: regulator, dates, findings, and remediation.	Table
1.2.3.2	Have you or affiliated entities been subject to regulatory enforcement actions, sanctions, or fines? If yes, provide full details.	Narrative
1.2.3.3	Are you currently subject to ongoing regulatory investigations or inquiries?	Narrative
<b>1.2.4</b>	<b>AML/KYC Program</b>	
1.2.4.1	Provide your AML/KYC policies and procedures. When were they last updated?	Upload
1.2.4.2	Who is your MLRO or AML Compliance Officer? Provide name, qualifications, and reporting line.	Narrative
1.2.4.3	Describe your investor onboarding and KYC process, including: documentation required, verification procedures, and risk rating methodology.	Narrative
1.2.4.4	How do you screen investors against sanctions lists? What systems are used and what is screening frequency?	Narrative
1.2.4.5	How do you monitor ongoing investor activity for suspicious transactions?	Narrative
1.2.4.6	Have you filed SARs/STRs? If yes, provide statistics without identifying details.	Narrative

#	Question	Response Type
<b>1.3</b>	<b>CONFLICTS OF INTEREST</b>	
<b>1.3.1</b>	<b>Conflicts Framework</b>	
1.3.1.1	Provide your Conflicts of Interest Policy. When was it last updated?	Upload
1.3.1.2	Maintain a conflicts register listing all identified conflicts, affected parties, and mitigation controls. Provide the current register.	Upload
1.3.1.3	How do you identify, evaluate, and manage conflicts? Include identification process, governance review, and disclosure framework.	Narrative
<b>1.3.2</b>	<b>Material Conflicts</b>	
1.3.2.1	Does the manager or any affiliate: trade for proprietary accounts, have affiliated service providers, invest own capital in strategies, manage competing strategies, have soft dollar arrangements, or engage in principal transactions? For each, describe and explain mitigation.	Table
1.3.2.2	Do related parties invest in your funds? If yes, describe terms and whether preferential.	Narrative
1.3.2.3	How do you disclose material conflicts to investors? Provide examples from offering documents.	Upload
<b>1.3.3</b>	<b>Code of Ethics and Personal Trading</b>	
1.3.3.1	Provide your Code of Ethics and Personal Trading Policy. When were they last updated?	Upload
1.3.3.2	What restrictions apply to employee personal trading? Include: restricted securities, pre-clearance requirements, holding periods, and blackout periods.	Narrative

#	Question	Response Type
1.3.3.3	How do you monitor employee personal trading for compliance? What systems or processes are used?	Narrative
1.3.3.4	Provide your MNPI Policy. How do you prevent misuse of material non-public information?	Upload
<b>1.3.4</b>	<b>Gifts, Entertainment, and Anti-Corruption</b>	
1.3.4.1	Provide your Gifts & Entertainment Policy and Anti-Bribery/Anti-Corruption Policy. What thresholds and approvals are required?	Upload
1.3.4.2	How do you track and report gifts and entertainment given and received?	Narrative
<b>1.3.5</b>	<b>Training and Enforcement</b>	
1.3.5.1	How often do you train employees on conflicts, ethics, and personal trading? How is participation tracked?	Narrative
1.3.5.2	How do you monitor for violations? What happens when violations are detected?	Narrative
1.3.5.3	Have you had conflicts or ethics violations in the past 3 years? If yes, describe nature and remediation.	Narrative

## SECTION 2: INVESTMENT MANAGEMENT & RISK DISCIPLINE

*This section assesses compliance with DFSB Standards 4-7: Investment Policy and Governance, Investment Operations, Risk Management, and Leverage and Liquidity Management*

#	Question	Response Type
2.1	INVESTMENT POLICY AND GOVERNANCE	
2.1.1	Investment Philosophy and Strategy	
2.1.1.1	What is your core investment philosophy? What beliefs about markets drive your strategy?	Narrative
2.1.1.2	For each strategy, provide: name, type, inception date, current AUM, target return, expected volatility, and maximum leverage.	Table
2.1.1.3	Describe the investment thesis for each strategy. What market inefficiencies are you exploiting, and what is your edge?	Narrative
2.1.1.4	Under what market conditions does each strategy work best and worst? Were you exposed to LUNA, FTX, or other major failures?	Narrative
2.1.2	Written Investment Policies	
2.1.2.1	Provide your written Investment Policy Statement for each strategy. When was it last updated?	Upload
2.1.2.2	What investment objectives, risk tolerances, and constraints define each portfolio?	Narrative



#	Question	Response Type
<b>2.1.3 Investment Committee and Decision-Making</b>		
2.1.3.1	Do you have a formal Investment Committee? If yes, provide: members, roles, meeting frequency, decision-making authority, and whether minutes are maintained.	Table
2.1.3.2	Who makes decisions at each stage (idea generation, research, portfolio construction, execution, exit)? How are decisions documented?	Narrative
2.1.3.3	For systematic strategies: Under what conditions can humans override models? Who has authority and how is this documented?	Narrative
<b>2.1.4 Performance Measurement</b>		
2.1.4.1	Provide complete monthly performance since inception for each strategy (NAV and returns, gross and net).	Table
2.1.4.2	Provide your five largest drawdowns for each strategy with: dates, magnitude, duration, recovery time, and cause.	Table
2.1.4.3	How do you attribute performance? What benchmarks do you use? Is performance audited or GIPS verified?	Narrative
<b>2.1.5 Investment Guidelines and Capacity</b>		
2.1.5.1	What investment restrictions and guidelines apply? Include regulatory, contractual, and self-imposed limits. How are they monitored?	Narrative
2.1.5.2	What is maximum capacity for each strategy? What is current % of capacity deployed?	Table
2.1.5.3	Have you had investment guideline breaches in the past 3 years? If yes, describe and explain resolution.	Narrative

#	Question	Response Type
<b>2.2</b>	<b>INVESTMENT OPERATIONS</b>	
<b>2.2.1</b>	<b>Tradable Instruments and Markets</b>	
2.2.1.1	What instruments do you trade? For each strategy, specify: spot, futures, options, perpetuals, other derivatives.	Table
2.2.1.2	Where do you trade? List: centralized exchanges, DEXs, OTC markets. What percentage of assets are held on exchanges vs. custodians?	Table
2.2.1.3	Do you have exposure to DeFi protocols, smart contracts, or governance tokens? If yes, describe risk assessment and controls.	Narrative
<b>2.2.2</b>	<b>Best Execution</b>	
2.2.2.1	Provide your Best Execution Policy. When was it last updated?	Upload
2.2.2.2	How do you define best execution in digital asset markets? What metrics do you monitor (slippage, fill rates, market impact)?	Narrative
2.2.2.3	Do you perform Transaction Cost Analysis (TCA)? How often and who reviews results?	Narrative
<b>2.2.3</b>	<b>Trading Infrastructure</b>	
2.2.3.1	What trading systems do you use? For each, specify: name, purpose, in-house or vendor, and integration with risk/portfolio systems.	Table
2.2.3.2	Provide a diagram of your complete trade flow from signal generation to execution and settlement.	Upload
2.2.3.3	What percentage of trading is manual vs. automated? Who has trading permissions?	Table

#	Question	Response Type
2.2.3.4	What pre-trade checks are in place (limits, concentration, regulatory restrictions)?	Narrative
<b>2.2.4</b>	<b>Trading Venues and Settlement</b>	
2.2.4.1	List all exchanges and the percentage of trading volume at each. Who are your top brokers/prime brokers by volume?	Table
2.2.4.2	Do you use OTC counterparties or DEXs? If yes, list counterparties/platforms and percentage of volume.	Table
2.2.4.3	How do you select and approve trading venues? What due diligence is performed?	Narrative
2.2.4.4	How often do you reconcile positions across brokers, exchanges, custodians, and internal systems? Is this automated?	Narrative
2.2.4.5	How are wallet balances reconciled to P&L? What tolerance thresholds apply and how are breaks resolved?	Narrative
<b>2.2.5</b>	<b>Trade Allocation and Error Management</b>	
2.2.5.1	Provide your Trade Allocation Policy. How do you allocate trades across accounts and strategies fairly?	Upload
2.2.5.2	How do you handle partial fills and resolve allocation conflicts?	Narrative
2.2.5.3	Provide your Trade Error Policy. What preventive controls exist and who bears error costs?	Upload
2.2.5.4	Have you had trade errors in the past 3 years? Provide summary statistics without investor details.	Narrative

#	Question	Response Type
<b>2.2.6</b>	<b>Audit Trail</b>	
2.2.6.1	What systems maintain audit trails for all trading activities? What information is captured and how long is it retained?	Narrative
<b>2.3</b>	<b>RISK MANAGEMENT</b>	
<b>2.3.1</b>	<b>Risk Management Framework</b>	
2.3.1.1	Provide your Risk Management Policy. When was it last updated?	Upload
2.3.1.2	Describe your risk management framework including philosophy, integration with investment process, and governance.	Narrative
2.3.1.3	Who oversees risk management? Do you have a CRO? Is the risk function independent from investment team?	Narrative
2.3.1.4	Do you have a Risk Committee? If yes, provide: members, mandate, meeting frequency, and oversight scope.	Table
2.3.1.5	Can risk personnel stop trading or force position reductions? Under what circumstances?	Narrative
2.3.1.6	Do you have a board-approved Risk Appetite Statement? If yes, provide it.	Upload
<b>2.3.2</b>	<b>Risk Measurement and Limits</b>	
2.3.2.1	What material risks do you face? For each, describe: market, credit, operational, liquidity, technology, counterparty, regulatory.	Table
2.3.2.2	What risk metrics do you monitor? For each, provide: calculation methodology, monitoring frequency, and responsible party (VaR, CVaR, volatility, drawdown, etc.).	Table

#	Question	Response Type
2.3.2.3	What real-time risk monitoring capabilities exist? Describe systems, dashboards, and alerts.	Narrative
2.3.2.4	What formal risk limits do you maintain? For each, provide: limit type, value, and monitoring frequency.	Table
2.3.2.5	What position-level and concentration limits apply? What are current exposures relative to limits?	Table
2.3.2.6	What happens when risk limits are breached? Include detection, escalation, and remediation procedures.	Narrative
2.3.2.7	Have you had risk limit breaches in the past 3 years? If yes, describe circumstances.	Narrative
<b>2.3.3</b>	<b>Stress Testing</b>	
2.3.3.1	What is your stress testing framework? Include frequency, scenarios (exchange failures, depegs, hacks, crashes), and how results inform decisions.	Narrative
2.3.3.2	What are worst-case loss scenarios for each strategy? How do you model extreme events and correlation breakdowns?	Narrative
2.3.3.3	What contingency plans exist for stress scenarios? Provide most recent stress test results.	Upload
<b>2.3.4</b>	<b>Counterparty Risk</b>	
2.3.4.1	Provide your Counterparty Risk Policy. When was it last updated?	Upload
2.3.4.2	What is your current exposure by counterparty type? Provide breakdown by: exchanges, prime brokers, custodians, OTC counterparties, DeFi protocols.	Table

#	Question	Response Type
2.3.4.3	Who are your five largest counterparties by exposure? For each, provide: name, exposure as % of NAV, and mitigation measures.	Table
2.3.4.4	What due diligence do you perform on counterparties? How do you monitor them on an ongoing basis?	Narrative
2.3.4.5	What counterparty failures or issues have you experienced? What lessons were learned?	Narrative
<b>2.3.5</b>	<b>Operational Risk</b>	
2.3.5.1	Provide your Operational Risk Policy. How do you identify, log, and remediate operational risks?	Upload
2.3.5.2	How do you manage key person risk through succession planning, documentation, and cross-training?	Narrative
2.3.5.3	What operational incidents have you experienced in the past 3 years? For each, describe: cause, impact, resolution, and prevention measures.	Narrative
<b>2.4</b>	<b>LEVERAGE AND LIQUIDITY MANAGEMENT</b>	
<b>2.4.1</b>	<b>Leverage</b>	
2.4.1.1	Provide your Leverage Policy. When was it last updated?	Upload
2.4.1.2	How do you define and calculate leverage? What are min, max, and typical levels for each strategy?	Table
2.4.1.3	How is leverage monitored? What happens when limits are breached?	Narrative
<b>2.4.2</b>	<b>Liquidity Management</b>	
2.4.2.1	Provide your Liquidity Risk Policy. When was it last updated?	Upload

#	Question	Response Type
2.4.2.2	What is the liquidity profile of each strategy? For each, provide percentage that can be liquidated in: 24 hours, 1 week, 30 days under normal and stressed conditions.	Table
2.4.2.3	How does portfolio liquidity align with investor redemption terms? Are there mismatches and how are they managed?	Narrative
2.4.2.4	What investor redemption terms apply? Include notice periods, dealing frequency, lock-ups, gates, and side pockets.	Table
2.4.2.5	Have you imposed gates or suspended redemptions? If yes, describe circumstances and investor communication.	Narrative
<b>2.4.3</b>	<b>Funding and Concentration</b>	
2.4.3.1	How do you manage funding risk? Do you maintain credit facilities or emergency funding arrangements?	Narrative
2.4.3.2	What concentration limits apply by: position, asset, sector, protocol, counterparty? What are largest positions as % of NAV?	Table

## SECTION 3: FINANCIAL INTEGRITY & SAFEGUARDS

*This section assesses compliance with DFSB Standards 8-11: Safekeeping of Assets, Counterparty Management, Valuation and Performance, and Treasury Controls*

#	Question	Response Type
<b>3.1</b>	<b>SAFEKEEPING OF ASSETS</b>	
<b>3.1.1</b>	<b>Custody Framework</b>	
3.1.1.1	Who are your custodians for digital assets? For each, provide: name, domicile, regulatory status, services, and appointment date.	Table
3.1.1.2	What criteria do you use to select custodians? Include evaluation factors and approval process.	Narrative
3.1.1.3	What types of custody arrangements exist (segregated, omnibus, commingled)? Are assets legally owned by the fund?	Narrative
3.1.1.4	How do you ensure investor assets are segregated and protected in custodian insolvency?	Narrative
3.1.1.5	What percentage of assets are held with qualified custodians vs. self-custody?	Table
<b>3.1.2</b>	<b>Digital Asset Security and Key Management</b>	
3.1.2.1	What technology is used for custody? Describe: MPC, HSM, multi-sig wallets, cold storage, hot wallets.	Narrative
3.1.2.2	How are private keys generated, stored, and protected? How many parties control keys and what are quorum requirements?	Narrative
3.1.2.3	How do you rotate keys? What controls exist for lost, stolen, or compromised keys?	Narrative



3.1.2.4	Do custodians provide SOC 1, SOC 2, or equivalent reports? Provide most recent copies.	Upload
<b>3.1.3</b>	<b>Custody Operations</b>	
3.1.3.1	What is your process for moving assets into and out of custody? Include approval steps, verification procedures, and segregation of duties.	Narrative
3.1.3.2	Who can initiate, approve, and release custody transfers? Provide authority matrix.	Table
3.1.3.3	How do you reconcile custody balances daily between manager, custodian, and administrator? What tolerance thresholds apply?	Narrative
3.1.3.4	How do you verify on-chain balances? How are wallet address lists managed and updated?	Narrative
<b>3.1.4</b>	<b>Custody Risk Management</b>	
3.1.4.1	How often are custodians reviewed? What metrics are evaluated?	Narrative
3.1.4.2	What insurance coverage do custodians maintain? For each, provide: coverage types, limits, deductibles, and exclusions.	Table
3.1.4.3	What additional insurance do you maintain (crime, cyber, theft)?	Narrative
3.1.4.4	What is maximum counterparty exposure to a single custodian as % of assets? How do you diversify?	Table
3.1.4.5	What is your hot wallet vs. cold storage allocation policy?	Narrative
<b>3.1.5</b>	<b>Specialized Digital Asset Risks</b>	
3.1.5.1	How do you manage risks with staking, yield farming, or lending from custody? Include slashing risk controls.	Narrative

3.1.5.2	What controls govern rehypothecation? How do you manage wrapped tokens, bridges, or synthetic assets?	Narrative
3.1.5.3	How do you handle forks, airdrops, and protocol events? Do you maintain legal opinions on custody enforceability?	Narrative
<b>3.2</b>	<b>COUNTERPARTY MANAGEMENT</b>	
<b>3.2.1</b>	<b>Due Diligence and Selection</b>	
3.2.1.1	Provide your Counterparty Risk Policy. When was it last updated?	Upload
3.2.1.2	What is your due diligence process for counterparties and service providers? Include evaluation criteria, analysis, and approval requirements.	Narrative
3.2.1.3	What minimum standards must counterparties meet (regulatory status, financial strength, operational capabilities, insurance)?	Narrative
<b>3.2.2</b>	<b>Diversification and Monitoring</b>	
3.2.2.1	What is your current exposure by counterparty? Provide breakdown showing: name, type, exposure amount, and % of NAV for exchanges, prime brokers, custodians, OTC counterparties, banks, DeFi protocols.	Table
3.2.2.2	What concentration limits apply to counterparty exposures? How are limits monitored and enforced?	Narrative
3.2.2.3	How do you monitor counterparties on an ongoing basis? Include monitoring frequency, metrics/indicators tracked, and early warning triggers.	Narrative
3.2.2.4	How do you monitor exchange reserves and proof-of-reserves?	Narrative

<b>3.2.3</b>	<b>Incidents and Contingency Planning</b>	
3.2.3.1	What counterparty failures or issues have you experienced? For each, describe: counterparty, issue, impact, and resolution.	Narrative
3.2.3.2	What contingency plans exist for counterparty failures? How quickly can you transition to alternatives?	Narrative
3.2.3.3	Do you maintain backup relationships with alternative service providers?	Narrative
<b>3.3</b>	<b>VALUATION AND PERFORMANCE</b>	
<b>3.3.1</b>	<b>Valuation Framework</b>	
3.3.1.1	Provide your Valuation Policy. When was it last updated?	Upload
3.3.1.2	Who is responsible for calculating NAV? How are responsibilities split between manager and administrator?	Narrative
3.3.1.3	Do you have a Valuation Committee? If yes, provide: composition, responsibilities, meeting frequency, and independence.	Narrative
3.3.1.4	Under what circumstances can administrator prices be overridden? What authorizations and documentation are required?	Narrative
<b>3.3.2</b>	<b>Pricing Sources and Methodology</b>	
3.3.2.1	What pricing sources do you use? For each asset type, list sources ranked in order of preference.	Table
3.3.2.2	What is your pricing hierarchy when multiple prices are available? What fallback methods exist for illiquid assets?	Narrative
3.3.2.3	How do you identify and reject stale or manipulated prices?	Narrative

3.3.2.4	How do you value complex instruments (LP tokens, yield positions, staked assets, DeFi exposures)?	Narrative
<b>3.3.3 NAV Calculation Process</b>		
3.3.3.1	When and how frequently is NAV calculated for each fund? Specify time zone, market close conventions, and cutoff times.	Table
3.3.3.2	Describe the complete NAV calculation process from data collection to publication. Include verification controls.	Narrative
3.3.3.3	Do both administrator and manager calculate NAV independently? How are differences reconciled?	Narrative
3.3.3.4	What controls ensure NAV accuracy? Include variance analysis and investigation thresholds.	Narrative
3.3.3.5	How long after period end is NAV finalized? What is typical timeline to investor reporting?	Narrative
<b>3.3.4 Asset Verification and Reconciliation</b>		
3.3.4.1	How do you verify assets for NAV? Do you use on-chain verification?	Narrative
3.3.4.2	How frequently do you reconcile balances among wallets, administrator, and custodian? What tolerance thresholds apply?	Narrative
3.3.4.3	Do you provide wallet addresses to administrators and auditors for independent verification?	Narrative
<b>3.3.5 Specialized Valuation Issues</b>		
3.3.5.1	How do you handle valuation during exchange outages or market disruptions?	Narrative
3.3.5.2	What percentage of portfolio is in non-exchange-traded or illiquid assets? How are these valued?	Table

3.3.5.3	How do you value stablecoins? Do you value at par or mark to market?	Narrative
3.3.5.4	How do you treat airdrops, forks, staking rewards, and DeFi income in valuation?	Narrative
<b>3.3.6</b>	<b>NAV Errors and Quality Control</b>	
3.3.6.1	Has NAV ever been restated? If yes, provide: dates, magnitude, causes, and remediation.	Narrative
3.3.6.2	What thresholds determine NAV restatement vs. prospective adjustment? How are corrections communicated to investors?	Narrative
3.3.6.3	Are you GIPS compliant or verified? If yes, provide verification report.	Upload
<b>3.4</b>	<b>TREASURY CONTROLS</b>	
<b>3.4.1</b>	<b>Cash Control Framework</b>	
3.4.1.1	Provide your Cash Control Policy for fiat and digital assets. When was it last updated?	Upload
3.4.1.2	Who can initiate, approve, and release transfers at fund and manager level? Provide authority matrix with names, roles, and limits.	Table
3.4.1.3	What multi-signature or dual authorization framework exists? Is dual authorization always enforced?	Narrative
3.4.1.4	What authentication methods are required (hardware tokens, biometrics, MFA)?	Narrative
3.4.1.5	How do you enforce segregation of duties between initiation and approval?	Narrative

3.4.2 Banking and Account Management		
3.4.2.1	Which banks do you use for fiat? For each, provide: name, jurisdiction, account type, and purpose.	Table
3.4.2.2	How does account structure ensure segregation between client and firm money? What legal protections exist?	Narrative
3.4.2.3	How do you diversify banking relationships? What concentration limits apply?	Narrative
3.4.3 Administrator Integration		
3.4.3.1	What role does the administrator play in payments and cash management? How is dual control implemented?	Narrative
3.4.3.2	Does the administrator perform independent verification before payment release? What is verified?	Narrative
3.4.3.3	How are payment instructions transmitted securely to the administrator?	Narrative
3.4.4 Reconciliation and Monitoring		
3.4.4.1	How frequently do you reconcile cash between manager, administrator, and banks? Describe the complete process.	Narrative
3.4.4.2	What tolerance thresholds apply? How are breaches investigated?	Narrative
3.4.4.3	How do you monitor in-transit items and investigate payment failures?	Narrative
3.4.5 Digital Asset Cash Management		
3.4.5.1	How do you treat stablecoins in cash management? Which stablecoins and why?	Narrative

3.4.5.2	How do you monitor stablecoin issuers? Include reserve verification and exposure limits.	Narrative
3.4.5.3	What security measures exist for crypto transfers? Include address whitelisting, time delays, and other controls.	Narrative
3.4.5.4	What procedures prevent transfers to incorrect addresses?	Narrative
<b>3.4.6 Security and Fraud Prevention</b>		
3.4.6.1	What controls prevent unauthorized payments? How do you validate new payees or changes to payment instructions?	Narrative
3.4.6.2	How do you monitor for suspicious payment activity? What cybersecurity measures protect payment systems?	Narrative
3.4.6.3	What insurance coverage exists for fraud, theft, or cash losses? Have you experienced payment fraud or incidents?	Narrative

## SECTION 4: TECHNOLOGY & INFRASTRUCTURE

*This section assesses compliance with DFSB Standard 12: Technology and Cybersecurity*

#	Question	Response Type
4.1	<b>TECHNOLOGY ARCHITECTURE AND SYSTEMS</b>	
4.1.1	<b>System Architecture</b>	
4.1.1.1	Provide an overview of your technology architecture. Include trading, risk, portfolio, accounting, and reporting systems.	Narrative
4.1.1.2	Provide a system architecture diagram showing all major systems and integrations.	Upload

4.1.1.3	Which systems are proprietary vs. vendor-supplied? For each major system, specify: name, purpose, vendor/in-house, and implementation date.	Table
4.1.1.4	How are systems integrated across front, middle, and back office? How do you ensure data accuracy and timeliness?	Narrative
4.1.1.5	Do you use cloud infrastructure? If yes, which providers, what services, and what security controls?	Narrative
<b>4.1.2 Vendor Management</b>		
4.1.2.1	List all critical technology vendors. For each, provide: name, services provided, and contract term.	Table
4.1.2.2	How do you select, approve, and monitor technology vendors? Do you require SOC 2 reports from critical vendors?	Narrative
4.1.2.3	How do you monitor vendor performance? What SLAs exist and how are breaches handled?	Narrative
4.1.2.4	Have you replaced key technology vendors in the past 3 years? If yes, describe reasons and transition.	Narrative
<b>4.1.3 System Management and Availability</b>		
4.1.3.1	What is your process for testing and approving system changes? Include change management controls and rollback procedures.	Narrative
4.1.3.2	What are your target uptime levels for critical systems? What actual uptime have you achieved over the past 12 months?	Table
4.1.3.3	Have you experienced material system outages in the past 3 years? If yes, describe: date, duration, cause, impact, and remediation.	Narrative
4.1.3.4	What redundancy and failover capabilities exist for critical systems?	Narrative



<b>4.2</b>	<b>INFORMATION SECURITY AND CYBERSECURITY</b>	
<b>4.2.1</b>	<b>Security Framework</b>	
4.2.1.1	Provide your Information Security Policy. When was it last updated?	Upload
4.2.1.2	Who is your CISO or equivalent? Provide background and reporting structure.	Narrative
4.2.1.3	What cybersecurity framework do you follow (NIST, ISO 27001, SOC 2)? Are you certified? If yes, provide certificates and audit reports.	Upload
4.2.1.4	What is your information security budget as % of operating expenses?	Narrative
<b>4.2.2</b>	<b>Technical Security Controls</b>	
4.2.2.1	What technical security controls exist? Describe: firewalls, intrusion detection/prevention, anti-malware, encryption, endpoint protection, network segmentation.	Narrative
4.2.2.2	How do you encrypt data at rest and in transit? What encryption standards apply?	Narrative
4.2.2.3	What endpoint security measures protect employee devices? Include MDM, encryption, and remote wipe.	Narrative
4.2.2.4	What security controls protect APIs used for trading, data feeds, and integrations?	Narrative
<b>4.2.3</b>	<b>Identity and Access Management</b>	
4.2.3.1	How do you manage identity and access? Describe user provisioning, de-provisioning, and access review procedures.	Narrative
4.2.3.2	What authentication methods are required? Is MFA required for all users? If not, what exceptions exist?	Narrative

4.2.3.3	How do you implement role-based access control (RBAC)? How are permissions managed?	Narrative
4.2.3.4	How do you manage privileged access to critical systems?	Narrative
4.2.3.5	How often do you review user access rights? What de-provisioning timelines exist when employees leave?	Narrative
4.2.3.6	Do you maintain audit logs of access to critical systems? How long are logs retained?	Narrative
<b>4.2.4 Vulnerability Management and Monitoring</b>		
4.2.4.1	How do you monitor for cybersecurity threats? Include SIEM, threat intelligence, and monitoring services.	Narrative
4.2.4.2	Do you conduct vulnerability assessments and penetration testing? If yes, how often, who performs them, and when was most recent?	Narrative
4.2.4.3	Provide the most recent penetration test report or executive summary.	Upload
4.2.4.4	How do you remediate identified vulnerabilities? Include prioritization and timelines.	Narrative
<b>4.2.5 Incident Response</b>		
4.2.5.1	Provide your Cybersecurity Incident Response Plan. When was it last updated?	Upload
4.2.5.2	Who is on your incident response team? What are their roles?	Table
4.2.5.3	What escalation procedures exist for different severity levels? How quickly can you detect and respond?	Narrative
4.2.5.4	Have you experienced cybersecurity breaches or incidents? If yes, describe: date, nature, impact, response, and remediation.	Narrative

4.2.5.5	How often do you test your incident response plan? When was the most recent test?	Narrative
<b>4.2.6</b>	<b>Security Awareness and Training</b>	
4.2.6.1	What cybersecurity training do employees receive? Include frequency, topics, and delivery methods.	Narrative
4.2.6.2	Do you conduct phishing simulations or social engineering tests? If yes, how often?	Narrative
4.2.6.3	How is training participation tracked? What happens when employees fail security tests?	Narrative
<b>4.2.7</b>	<b>Cyber Insurance</b>	
4.2.7.1	Do you carry cyber insurance? If yes, provide: carrier, coverage limits, deductibles, scope, and material exclusions.	Narrative
4.2.7.2	Have you filed cyber insurance claims? If yes, provide summary without sensitive details.	Narrative
<b>4.3</b>	<b>DATA MANAGEMENT AND PRIVACY</b>	
<b>4.3.1</b>	<b>Data Management</b>	
4.3.1.1	Provide your Data Management Policy and Data Privacy Policy. When were they last updated?	Upload
4.3.1.2	How do you manage firm and investor data? Include storage locations, encryption, access controls, and backups.	Narrative
4.3.1.3	What backup procedures exist? Include frequency, retention periods, and storage locations. How often do you test backup restoration?	Narrative
4.3.1.4	What data classification scheme exists? How is sensitive data identified and protected?	Narrative

<b>4.3.2 Data Privacy</b>		
4.3.2.1	How do you comply with data privacy regulations (GDPR, CCPA)? Do you have a DPO?	Narrative
4.3.2.2	How do you handle cross-border data transfers? What legal mechanisms ensure compliance?	Narrative
4.3.2.3	Have you experienced data breaches or privacy incidents? If yes, describe circumstances and remediation.	Narrative
<b>4.4</b>	<b>BUSINESS CONTINUITY AND DISASTER RECOVERY</b>	
<b>4.4.1 BCP/DRP Framework</b>		
4.4.1.1	Provide your Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP). When were they last updated?	Upload
4.4.1.2	What are your recovery time objectives (RTO) and recovery point objectives (RPO) for critical systems and functions?	Table
4.4.1.3	Who is responsible for BCP/DRP? What scenarios are covered (cyberattacks, exchange outages, natural disasters, pandemics, key person loss)?	Narrative
<b>4.4.2 Redundancy and Capabilities</b>		
4.4.2.1	What redundancy exists across offices, systems, and staff? Do you have backup office locations or work-from-home capabilities?	Narrative
4.4.2.2	What failover capabilities exist for critical trading, risk, and operations systems?	Narrative
4.4.2.3	Do you maintain hot, warm, or cold disaster recovery sites? How quickly can they be activated?	Narrative
<b>4.4.3 Testing and Exercises</b>		

4.4.3.1	How often do you test BCP/DRP? What types of tests (tabletop, simulations, full failovers)?	Narrative
4.4.3.2	When was the most recent test? What were the results and what issues were identified?	Narrative
4.4.3.3	Have you experienced business continuity events in the past 3 years? If yes, describe response and lessons learned.	Narrative
4.4.3.4	How did you operate during the COVID-19 pandemic? What challenges arose and what changes resulted?	Narrative
<b>4.4.4</b>	<b>Service Provider Business Continuity</b>	
4.4.4.1	How do you ensure service providers maintain adequate BCP/DRP? Do you review their plans?	Narrative
4.4.4.2	What alternative arrangements exist if primary service providers fail?	Narrative
<b>4.5</b>	<b>TECHNOLOGY GOVERNANCE</b>	
<b>4.5.1</b>	<b>Technology Leadership and Oversight</b>	
4.5.1.1	Who is responsible for technology governance (CIO, CTO)? Provide title, background, and reporting line.	Narrative
4.5.1.2	How often does senior management or the board review technology and cybersecurity? What topics are covered?	Narrative
4.5.1.3	What technology-related metrics or KPIs are reported to management and the board?	Table
<b>4.5.2</b>	<b>Technology Strategy and Resources</b>	

4.5.2.1	What is your annual technology budget? What percentage of operating expenses is allocated to technology?	Narrative
4.5.2.2	What percentage is allocated to: infrastructure, security, new development, maintenance, personnel?	Table
4.5.2.3	What is your technology strategy? What investments are planned for the next 12-24 months?	Narrative

## SECTION 5: COMPLIANCE & INVESTOR RELATIONS

*This section assesses compliance with DFSB Standards 13-14: Client Due Diligence and Transparency and Communication*

#	Question	Response Type
<b>5.1</b>	<b>CLIENT DUE DILIGENCE</b>	
<b>5.1.1</b>	<b>Investor Onboarding</b>	
5.1.1.1	Describe your complete investor onboarding process from initial contact through subscription. Include all steps, required documentation, and approvals.	Narrative
5.1.1.2	What documentation is required (subscription agreements, KYC documents, source of funds verification)?	Narrative
5.1.1.3	What investor verification procedures do you perform? Include identity, address, and beneficial ownership identification.	Narrative
5.1.1.4	Do you use third-party KYC verification services? If yes, which providers?	Narrative
5.1.1.5	What is the typical timeline from subscription to investor approval and funding?	Narrative

5.1.1.6	Who has authority to approve new investors? Under what circumstances would you reject a potential investor?	Narrative
<b>5.1.2 Risk-Based Approach and Enhanced Due Diligence</b>		
5.1.2.1	How do you risk-rate investors? Describe your risk assessment methodology and criteria.	Narrative
5.1.2.2	What factors trigger enhanced due diligence (EDD)? Include high-risk jurisdictions, PEPs, complex structures, and other risk factors.	Narrative
5.1.2.3	What additional steps are taken for high-risk investors during EDD?	Narrative
5.1.2.4	How do you identify politically exposed persons (PEPs)? What databases or services are used?	Narrative
5.1.2.5	Do you accept investors from high-risk jurisdictions? If yes, what additional controls apply? What countries do you prohibit?	Narrative
<b>5.1.3 Sanctions Screening</b>		
5.1.3.1	How do you screen investors against sanctions lists (OFAC, UN, EU, UK HMT)? What tools are used?	Narrative
5.1.3.2	At what frequency do you screen investors? Include initial screening and ongoing monitoring.	Narrative
5.1.3.3	How do you handle sanctions screening hits or potential matches? Include investigation and escalation procedures.	Narrative
5.1.3.4	Do you screen all beneficial owners, not just the investing entity?	Narrative
<b>5.1.4 Ongoing Monitoring and Suspicious Activity</b>		
5.1.4.1	What ongoing monitoring procedures exist for investors after onboarding? How often do you refresh KYC information?	Narrative

5.1.4.2	How do you monitor investor transactions and activity for suspicious patterns? What activity triggers investigation?	Narrative
5.1.4.3	What mechanisms exist for detecting suspicious activity? Provide examples of red flags.	Narrative
5.1.4.4	Who has authority to file SARs/STRs? What is your process for filing?	Narrative
5.1.4.5	How many SARs/STRs have you filed in the past 3 years? Provide annual statistics without identifying details.	Narrative
<b>5.1.5</b>	<b>Training and Testing</b>	
5.1.5.1	What AML/KYC training do personnel receive? Include frequency, topics, and participants.	Narrative
5.1.5.2	Do you conduct independent testing of your AML/KYC program? If yes, who performs it, how often, and what were the most recent results?	Narrative
<b>5.2</b>	<b>TRANSPARENCY AND COMMUNICATION</b>	
<b>5.2.1</b>	<b>Reporting Framework</b>	
5.2.1.1	What reporting do you provide to investors? For each report type, specify: name, frequency, timing after period end, and content.	Table
5.2.1.2	How long after period end are reports delivered? Provide timelines for: monthly, quarterly, annual, and audited financials.	Table
5.2.1.3	What information is included in standard investor reports? Describe: performance, attribution, exposures, risk metrics, holdings, liquidity, and manager commentary.	Narrative
5.2.1.4	Do you provide daily transparency or investor dashboards? If yes, describe scope and access.	Narrative



5.2.1.5	How do you ensure timeliness and accuracy of investor reports? Include review procedures and quality controls.	Narrative
<b>5.2.2 Performance and Risk Reporting</b>		
5.2.2.1	What performance metrics are reported? Include gross/net returns, benchmarks, volatility, Sharpe ratio, and other risk-adjusted metrics.	Table
5.2.2.2	How do you attribute performance? Do you provide factor, strategy, or sector attribution?	Narrative
5.2.2.3	What risk metrics are reported? Include VaR, volatility, drawdowns, and other relevant measures.	Table
5.2.2.4	Do you report portfolio exposures? What level of detail (gross/net exposure, sector, geographic, asset class)?	Narrative
5.2.2.5	How do you disclose leverage usage to investors?	Narrative
5.2.2.6	Do you provide stress test results or scenario analysis to investors?	Narrative
<b>5.2.3 Holdings Transparency</b>		
5.2.3.1	What level of portfolio transparency do you provide? Describe whether you disclose: full holdings, top positions, or aggregated exposures only.	Narrative
5.2.3.2	Do you provide position-level data? If yes, under what conditions and with what lag?	Narrative
5.2.3.3	How do you balance transparency with confidentiality of trading strategies?	Narrative
<b>5.2.4 Fee and Expense Reporting</b>		
5.2.4.1	How do you report fees and expenses to investors? Include frequency and level of detail.	Narrative

5.2.4.2	Do you disclose all-in fees including management fees, performance fees, and fund expenses?	Narrative
5.2.4.3	How do you disclose side letter provisions and preferential terms to other investors?	Narrative
<b>5.2.5 Material Event Disclosure</b>		
5.2.5.1	What events do you consider material requiring investor notification?	Narrative
5.2.5.2	How quickly do you notify investors of material events? Provide timelines for: key personnel changes, service provider changes, regulatory actions, operational incidents, NAV restatements, and liquidity gates.	Table
5.2.5.3	How do you communicate material events? Include notification methods and approval processes.	Narrative
5.2.5.4	Have you imposed liquidity gates, suspended redemptions, or restated NAV? If yes, how were investors notified?	Narrative
<b>5.2.6 Investor Communication Practices</b>		
5.2.6.1	How do you communicate with investors beyond standard reporting? Include investor letters, calls, webinars, meetings, and portal access.	Narrative
5.2.6.2	How often do portfolio managers or senior management interact directly with investors?	Narrative
5.2.6.3	Do you host investor days, annual meetings, or update calls? If yes, describe frequency and format.	Narrative
5.2.6.4	How do you handle ad hoc investor requests for information? Describe response procedures and turnaround time.	Narrative
5.2.6.5	Do you maintain an investor relations team or dedicated personnel? If yes, describe team and responsibilities.	Narrative

5.2.7 Transparency Governance		
5.2.7.1	Who reviews and approves investor reports before release? Describe approval hierarchy.	Narrative
5.2.7.2	What controls ensure consistency and accuracy of information across different communications?	Narrative
5.2.7.3	Have you had investor reporting errors? If yes, describe cause, impact, notification, and remediation.	Narrative
5.2.7.4	How are investor complaints about reporting handled and resolved?	Narrative
5.2.8 Crisis Communication		
5.2.8.1	What crisis communication procedures exist for adverse events (operational incidents, material losses, regulatory actions, key person departures)?	Narrative
5.2.8.2	Who has authority to communicate with investors during crisis situations?	Narrative
5.2.8.3	Have you experienced situations requiring crisis communication? If yes, describe how communication was managed.	Narrative

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## SECTION 6: HUMAN CAPITAL & SUSTAINABILITY

*This section assesses compliance with DFSB Standards 15-17: Organizational Continuity, Responsible Investment Stewardship, and Service Providers & Professional Relationships*

#	Question	Response Type
6.1	ORGANIZATIONAL CONTINUITY	
6.1.1	Organization and Staffing	
6.1.1.1	Provide an organizational chart showing all reporting lines, teams, and key functions.	Upload
6.1.1.2	How many employees work in each area? Provide breakdown by: investment, research, risk, operations, compliance, technology, finance, investor relations, administration.	Table
6.1.1.3	What is your current total headcount? How has it changed over the past 3 years?	Table
6.1.1.4	What is your annual employee turnover rate? Have you experienced significant turnover in the past 3 years?	Narrative
6.1.1.5	What background checks do you conduct on new hires? Include employment, education, criminal, credit, and regulatory checks.	Narrative
6.1.2	Senior Management and Key Personnel	
6.1.2.1	Provide biographies for all senior management. For each, include: name, title, education, prior experience, years at firm, and key responsibilities.	Upload
6.1.2.2	Provide biographies for all investment professionals. For each, include: name, title, education, prior experience, years at firm, investment focus, and track record.	Upload

6.1.2.3	How long have key individuals been with the firm? Provide tenure for all senior management and investment professionals.	Table
6.1.2.4	Have any senior managers or investment professionals left in the past 3 years? If yes, provide: name, role, departure date, reason, and how responsibilities were redistributed.	Table
6.1.2.5	Do any key personnel have regulatory disclosures or disciplinary history? If yes, provide full details.	Narrative
<b>6.1.3 Key Person Risk and Succession Planning</b>		
6.1.3.1	Who are the key persons at the firm? For each, explain why they are critical and what the impact would be if they departed.	Table
6.1.3.2	What succession plans exist for: CEO, CIO, CCO, COO, CFO, and key portfolio managers? Are plans documented and when were they last reviewed?	Narrative
6.1.3.3	Who are the identified successors for key roles? What is the timeline for successor readiness?	Narrative
6.1.3.4	How do you mitigate key person risk through: team depth, cross-training, process documentation, and retention incentives?	Narrative
6.1.3.5	Do you maintain key person insurance? If yes, provide coverage amounts, insured individuals, and beneficiaries.	Narrative
<b>6.1.4 Compensation and Retention</b>		
6.1.4.1	How are senior professionals compensated? Describe structure including base salary, annual bonus, performance fees/carry, equity, and other components.	Narrative
6.1.4.2	How is the bonus pool determined? What factors drive bonus pool size?	Narrative

6.1.4.3	Do you use deferred compensation, carried interest, or equity to retain staff? Describe vesting schedules and employee ownership percentage.	Narrative
6.1.4.4	What retention strategies exist beyond compensation?	Narrative
<b>6.1.5</b>	<b>Professional Development and Culture</b>	
6.1.5.1	What professional development programs do you provide? Include training, certifications, and career development paths.	Narrative
6.1.5.2	How do you evaluate employee performance? Describe review process and frequency.	Narrative
6.1.5.3	How would you describe your firm culture? What values are most important?	Narrative
6.1.5.4	What is your approach to diversity, equity, and inclusion (DEI)? Do you have a DEI policy or program?	Narrative
<b>6.2</b>	<b>RESPONSIBLE INVESTMENT STEWARDSHIP</b>	
<b>6.2.1</b>	<b>ESG Framework</b>	
6.2.1.1	Do you have an ESG policy? If yes, provide the policy and describe integration approach.	Upload
6.2.1.2	Who oversees ESG integration? How is ESG integrated into investment decisions?	Narrative
6.2.1.3	Are you a signatory to UN PRI, TCFD, or other ESG frameworks? If yes, provide status and reporting.	Narrative
<b>6.2.2</b>	<b>ESG Considerations in Digital Assets</b>	
6.2.2.1	What is your approach to evaluating energy consumption and environmental impact of blockchain networks?	Narrative

6.2.2.2	How do you assess governance quality of protocols and DAOs? Include decentralization, token distribution, voting mechanisms, and transparency.	Narrative
6.2.2.3	Do you participate in protocol governance or vote on proposals? If yes, describe approach and decision-making framework.	Narrative
6.2.2.4	Do you maintain exclusion lists based on ESG criteria? What is your policy on privacy coins or protocols with limited transparency?	Narrative
<b>6.2.3</b>	<b>ESG Reporting</b>	
6.2.3.1	What ESG disclosures do you provide to investors? How do you report on ESG integration and outcomes?	Narrative
<b>6.3</b>	<b>SERVICE PROVIDERS &amp; PROFESSIONAL RELATIONSHIPS</b>	
<b>6.3.1</b>	<b>Fund Administrator</b>	
6.3.1.1	Who is your fund administrator? Provide name, location, and date of appointment.	Narrative
6.3.1.2	What services does the administrator provide? Include NAV calculation, investor services, AML/KYC, reconciliations, and financial reporting.	Narrative
6.3.1.3	Who are the key contacts at the administrator? Provide names, titles, and tenure.	Table
6.3.1.4	Have you changed administrators? If yes, provide: previous administrator, change date, reason, and transition process.	Narrative
6.3.1.5	Provide the administrator's most recent SOC 1 Type II / SSAE 18 or equivalent report.	Upload
6.3.1.6	How do you oversee administrator performance? Include KPIs, SLAs, and review frequency.	Narrative

6.3.2 Auditor		
6.3.2.1	Who is your auditor? Provide firm name, office location, and date of appointment. Is it a Big 4, national, or regional firm?	Narrative
6.3.2.2	What services does the auditor provide? Who is the lead audit partner and how long in role?	Narrative
6.3.2.3	Have you changed auditors? If yes, provide: previous auditor, change date, reason, and whether voluntary.	Narrative
6.3.2.4	Have auditors ever issued qualified opinions or raised significant issues? If yes, describe circumstances.	Narrative
6.3.2.5	Provide the most recent audited financial statements for all funds and the management company.	Upload
6.3.2.6	When is your fiscal year end? When are audited financials typically completed?	Narrative
6.3.3 Custodians		
6.3.3.1	Who are your custodians for fiat and digital assets? For each, provide: name, location, regulatory status, and date of appointment.	Table
6.3.3.2	Have you changed custodians? If yes, provide: previous custodian, change date, reason, and transition process.	Narrative
6.3.3.3	Do custodians provide SOC 1, SOC 2, or equivalent reports? Provide most recent copies.	Upload
6.3.4 Prime Brokers		
6.3.4.1	Who are your prime brokers? For each, provide: name, services provided, and date relationship began.	Table
6.3.4.2	What services do prime brokers provide? What are your current exposures by prime broker as % of NAV?	Narrative



6.3.4.3	What are your margin terms and collateral arrangements? What rehypothecation rights exist?	Narrative
<b>6.3.5</b>	<b>Legal Counsel</b>	
6.3.5.1	Who are your legal advisors? For each, provide: firm name, jurisdiction, services provided, and date relationship began.	Table
6.3.5.2	Do you have separate counsel for: fund formation, regulatory, corporate, and litigation? Which counsel covers onshore vs. offshore?	Narrative
6.3.5.3	Do you have in-house legal counsel? If yes, provide name, title, and background.	Narrative
<b>6.3.6</b>	<b>Other Key Service Providers</b>	
6.3.6.1	Do you use external compliance consultants? If yes, provide: firm name, services, and engagement scope.	Narrative
6.3.6.2	Who are your critical technology and data vendors? For each, provide: name, services/systems provided, and contract term.	Table
6.3.6.3	Who are your banking partners? For each, provide: bank name, jurisdiction, services, and relationship length.	Table
<b>6.3.7</b>	<b>Insurance Coverage</b>	
6.3.7.1	What insurance coverage do you maintain? For each policy, provide: coverage type, carrier, coverage amount, deductible, and material exclusions. Include: D&O, E&O, crime/fidelity, cyber, and other relevant coverage.	Table
6.3.7.2	Have you filed insurance claims? If yes, provide: claim type, date, outcome, and impact.	Narrative
6.3.7.3	How often do you review and update insurance coverage? When was coverage last reviewed?	Narrative

6.3.8 Service Provider Oversight		
6.3.8.1	What is your overall process for selecting, approving, and monitoring service providers?	Narrative
6.3.8.2	Do you maintain a formal service provider oversight policy or framework? If yes, provide the policy.	Upload
6.3.8.3	How often do you conduct formal reviews of service provider performance? What metrics are evaluated?	Narrative
6.3.8.4	Do you maintain a service provider oversight committee? If yes, describe mandate, membership, and meeting frequency.	Narrative
6.3.8.5	Have you terminated service providers for performance reasons? If yes, describe circumstances.	Narrative
6.3.8.6	What contingency plans exist if key service providers fail?	Narrative

## SECTION 7: BENCHMARKING & COMPETITIVE POSITIONING

*This section covers competitive benchmarking and emerging risks in digital asset markets. These questions are supplemental to DFSB Standards and address rapidly evolving industry topics.*

#	Question	Response Type
7.1	PERFORMANCE BENCHMARKING	
7.1.1	What percentile does your Sharpe ratio rank within your strategy peer group? Provide third-party database comparison.	Table
7.1.2	How does your maximum drawdown compare to similar strategies? Provide peer data.	Table

7.1.3	What is your Information Ratio relative to your stated benchmark?	Narrative
7.1.4	How do your fees compare to similar strategies? Provide fee survey data.	Table
7.1.5	What is your win/loss ratio compared to peer group averages?	Table
<b>7.2</b>	<b>OPERATIONAL BENCHMARKING</b>	
7.2.1	How does your operational expense ratio compare to peers of similar AUM?	Table
7.2.2	What is your technology spend as % of revenue versus industry benchmarks?	Table
7.2.3	How does your team size per \$1B AUM compare to peer firms?	Table
7.2.4	What are your audit and compliance costs relative to industry averages?	Table
7.2.5	How do your investor concentration metrics compare to similar funds?	Table

## SECTION 8: EMERGING TECHNOLOGIES & RISKS

*This section covers emerging technologies and novel risks in digital asset markets. Complete only sections relevant to your investment activities and exposures.*

#	Question	Response Type
<b>8.1</b>	<b>TOKENIZATION AND DIGITAL SECURITIES</b>	
8.1.1	Do you invest in tokenized securities or security tokens? Describe regulatory compliance framework.	Narrative
8.1.2	What is your framework for evaluating tokenized real-world assets (RWAs)?	Narrative
8.1.3	How do you verify the backing and custody of tokenized assets?	Narrative
8.1.4	What smart contract risks do you assess for tokenized products?	Narrative
8.1.5	Do you participate in tokenized fund structures? Describe governance and controls.	Narrative
<b>8.2</b>	<b>REAL WORLD ASSETS (RWA) INTEGRATION</b>	
8.2.1	What exposure do you have to RWA protocols (Centrifuge, Goldfinch, Maple, etc.)? Provide position breakdown.	Table
8.2.2	How do you evaluate default risk and recovery processes for RWA lending?	Narrative
8.2.3	What due diligence do you perform on RWA originators and servicers?	Narrative
8.2.4	How do you assess legal enforceability of on-chain RWA claims?	Narrative

8.2.5	What are your concentration limits for RWA protocols and asset types?	Table
<b>8.3</b>	<b>LAYER 2 AND SCALING SOLUTIONS</b>	
8.3.1	What is your exposure to Layer 2 networks (Arbitrum, Optimism, Polygon, Base, etc.)? Provide network allocation.	Table
8.3.2	How do you assess bridge risk when moving assets between L1 and L2?	Narrative
8.3.3	What due diligence do you perform on L2 sequencer centralization and censorship resistance?	Narrative
8.3.4	How do you evaluate withdrawal delays and liquidity constraints on L2s?	Narrative
8.3.5	What security assessments do you require for L2 protocol upgrades?	Narrative
8.3.6	How do you monitor and manage MEV risks specific to L2 architectures?	Narrative
<b>8.4</b>	<b>ADVANCED DeFi AND EMERGING PROTOCOLS</b>	
8.4.1	Do you interact with liquid staking derivatives (LSDs)? Describe risk management approach.	Narrative
8.4.2	What is your approach to perpetual protocols and synthetic asset platforms?	Narrative
8.4.3	How do you evaluate restaking protocols (EigenLayer, etc.) and associated slashing risks?	Narrative
8.4.4	What exposure do you have to algorithmic stablecoins or novel peg mechanisms? Provide breakdown.	Table
8.4.5	How do you assess composability risks in complex DeFi strategies involving multiple protocols?	Narrative

## ABOUT THE DFSB

The DFSB is a 501(c)(6) nonprofit standards organization established to bridge institutional allocators and digital asset investment managers. DFSB develops operational standards, provides certification frameworks, and facilitates knowledge transfer between traditional finance and digital asset markets.

DFSB operates independently without commercial conflicts. The organization accepts no vendor fees, maintains no commercial relationships with service providers, and derives no revenue from certification requirements. This independence ensures standards reflect genuine operational requirements rather than vendor interests or commercial incentives.

Standards evolve as markets, regulations, and operational practices develop. DFSB maintains ongoing dialogue with allocators, managers, regulators, and service providers ensuring standards remain current, practical, and aligned with institutional expectations. Feedback on standards, suggestions for improvement, and operational implementation questions are welcomed at [info@dfsb.org](mailto:info@dfsb.org).

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