ALPINE CIPHER

Bank Readiness Scorecard: Operating entity

Issue 04 · September 2026 · 25 questions · maximum score 50

Twenty-five questions that determine whether a bank opens your company's account, scored the way a compliance committee scores it.

How to score

2 · True today, and we can produce the document within 48 hours.
1 · Partially true, or the document exists but is outdated or incomplete.
0 · Not true, or we do not know.

Questions marked GATE stop a file in committee on their own. A 0 on any of them caps the result at Do not apply yet, whatever the total.

01 · Entity & Licence (max 8)

1. Our certificate of incorporation and current commercial licence are valid, and the licence explicitly covers the activity we actually perform. [GATE] ■ 2 ■ 1 ■ 0

2. We can produce a shareholding chart tracing ownership down to named natural persons, with every nominee and intermediate holding company explained. [GATE] ■ 2 ■ 1 ■ 0

3. Passport and proof of address are on file for every UBO and director, certified and dated within the last three months. ■ 2 ■ 1 ■ 0

4. Our registered office and operational substance match what our licence assumes. ■ 2 ■ 1 ■ 0

02 · Financial Evidence (max 8)

5. We hold audited accounts, or management accounts supported by a continuous bank statement history. ■ 2 ■ 1 ■ 0

6. We can evidence the source of funds for the opening deposit separately from the company's ongoing trading revenue. ■ 2 ■ 1 ■ 0

7. Our revenue figures can be reconciled to bank records without explanation from us. ■ 2 ■ 1 ■ 0

8. We can show a clean twelve-month history free of unexplained large transfers. [GATE] ■ 2 ■ 1 ■ 0

03 · Compliance Framework (max 10)

9. We have a written AML/CFT policy that has been reviewed in the last twelve months. ■ 2 ■ 1 ■ 0

10. A named individual holds the MLRO or equivalent role, with a documented reporting line. ■ 2 ■ 1 ■ 0

11. We have a documented transaction monitoring and sanctions screening approach. ■ 2 ■ 1 ■ 0

12. Every UBO and director has been screened for sanctions, PEP status and adverse media, with a dated record and a written position on any hit. ■ 2 ■ 1 ■ 0

13. We have a written policy for onboarding and offboarding our own clients. ■ 2 ■ 1 ■ 0

04 · Digital Asset Infrastructure (max 6)

14. We name our chain analytics provider and document exactly what happens when an address flags. ■ 2 ■ 1 ■ 0

15. Our custody arrangement is named and documented: either self-custody with a written key management and signing policy, or a named regulated custodian. ■ 2 ■ 1 ■ 0

16. We can name our exchange, OTC and liquidity counterparties, document the licence status of each, and show the full fiat on-ramp and off-ramp path. ■ 2 ■ 1 ■ 0

05 · Tax & Reporting (max 6)

17. The tax residency of the entity and of every UBO is stated and evidenced, and it is consistent with where the business is actually run. ■ 2 ■ 1 ■ 0

18. Our CRS and FATCA self-certifications are complete and consistent with the shareholding chart we submit. ■ 2 ■ 1 ■ 0

19. We have no unresolved filing, registration or reporting obligation in any jurisdiction the structure touches. ■ 2 ■ 1 ■ 0

06 · Business Legibility (max 6)

20. We can describe our business in one page that a non-specialist compliance analyst could explain to a committee. ■ 2 ■ 1 ■ 0

21. We can state expected monthly volumes, currencies, jurisdictions and counterparty types, they are consistent with our stated business model, and we are confident we will operate within them. ■ 2 ■ 1 ■ 0

22. Nothing in our public footprint contradicts what our application says. ■ 2 ■ 1 ■ 0

07 · Institutional Positioning (max 6)

23. We know which specific institutions currently have appetite for our profile, licence type and jurisdiction. ■ 2 ■ 1 ■ 0

24. We have not been rejected by that institution before under a materially similar file. [GATE] ■ 2 ■ 1 ■ 0

25. We have a named sponsor or introducer at the institution rather than a general enquiry route. ■ 2 ■ 1 ■ 0

Reading the result

43–50 · Submission ready. Your file will be assessed on your business rather than your administration. The remaining work is institution selection and sequencing, not documentation.

30–42 · Fixable in weeks. The gaps are real but ordinary. Most files in this band fail on two or three specific items, not on general weakness. Fix those, then submit once.

18–29 · Do not apply yet. A submission now is likely to be rejected, and an avoidable rejection can complicate subsequent applications where the underlying issue remains unresolved. Sequence the fix before the application.

0–17 · Structural. The issue is probably not documentation. It is more often entity structure, licence scope, or the order in which the business was set up. Regulatory pathway and bankability have to be designed together: licensing may lead procedurally, but banking feasibility is validated alongside it, not afterwards.

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