

# From Fines to Fixes: Compliance Insights for Crypto Firms

Key takeaways from our recent  
webinar





# Regulatory Trends & Enforcement Shifts

**UK FCA Approach:** Increasing use of early intervention tools (Voluntary / Own Initiative Requirements, Skilled Person reviews) rather than direct enforcement

**Global Perspective:** France has intensified regulatory scrutiny, and the US remains active in enforcement, despite signs of regulatory shift





# Lessons from recent enforcement actions

**Governance Matters:** FCA's enforcement against CBPL (Coinbase affiliate) highlights the need for strong oversight, clear responsibilities, and well-documented risk management. Common thread amongst several recent enforcement actions

**Transaction Monitoring Pitfalls:** Failures in automated rules settings, data quality, alert handling and lack of controls and MI led to major fines in both France (BRED) & UK (Metro Bank)

**Compliance as a Business Priority:** Firms must integrate compliance into strategic decision-making and allocate sufficient resources to it (e.g. TD Bank in the USA)





# Proactive steps for firms

**Stay Informed:** Leverage FCA guidance, Dear CEO letters, and enforcement case studies

**Test & Document:** Regularly review controls, evidence remediation action to address deficiencies and ensure clear documentation of processes, roles and responsibilities

**Use Data Effectively:** Regulators now expect firms to “Know Your Data” and apply blockchain analytics intelligently





# Looking ahead in 2025

## **More Regulatory Engagement:**

Expect more RFIs, scrutiny on outsourced functions, and data-driven supervision

## **Cross-Border Collaboration:**

Regulators are working together to enhance global oversight

## **Increased Criminal Enforcement:**

The FCA and other regulators are stepping up prosecutions in crypto-related cases





For more insights, reach out to  
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