## Global Crypto and FinTech Regulatory Update

Recent Developments in Digital Asset Regulation and Market Conduct

## ASIC Obtains Interim Travel Ban Against Blockchain Global Director

On 29 October 2025, the Australian Securities and Investments Commission (ASIC) secured interim <u>travel restraint orders</u> from the Federal Court of Australia against Blockchain Global Limited (in liquidation) director Zijing (Ryan) Xu. The Federal Court order, made on 20 October 2025, prohibits Mr Xu from leaving or attempting to leave Australia until 20 December 2025.

ASIC sought the orders ex parte, citing concerns over potential evidence dissipation and non-cooperation in its ongoing investigation into the collapse of Blockchain Global's crypto asset exchange, ACX Exchange. The order was later varied by consent, extending the restraint to 28 November 2025, pending further hearings scheduled to address the continuation of travel restrictions and broader investigative matters.

## Investigation Background and Legal Proceedings

#### **Court Order Details**

The Federal Court order restrains Mr Xu from leaving Australia or taking steps to do so until 20 December 2025. ASIC's ex parte application was made without prior notice to Mr Xu, given the risk of evidence removal or evasion of investigative scrutiny.

#### **ACX Exchange Operations**

Blockchain Global operated ACX Exchange, one of Australia's earliest digital trading platforms, allowing customers to buy, sell, and store crypto assets from January 2016 until its collapse in December 2019.

#### **Regulatory Focus**

The regulator's probe concerns the management, governance, and financial operations of Blockchain Global and its associated exchange entities before their collapse.

Following mounting insolvency concerns and allegations of corporate mismanagement, Blockchain Global entered liquidation on 11 February 2022. ASIC's ongoing investigation is examining possible breaches of the Corporations Act 2001 and financial services laws, focusing on the firm's conduct, compliance practices, and governance failures leading to investor losses.

The case will return to the Federal Court for continued consideration before the 28 November 2025 hearing date. Further orders will determine whether the travel restraint remains in place pending ASIC's broader investigation into Blockchain Global's operations, asset tracing, and potential breaches of corporate and financial laws.

## ASIC Releases Summary of Consultation Feedback on Digital Asset Guidance

On 29 October 2025, the Australian Securities and Investments Commission (ASIC) released a comprehensive summary of stakeholder **responses to Consultation Paper 381 – Updates to INFO 225: Digital Assets – Financial Products and Services (CP 381)**. The consultation, which sought industry feedback on proposed revisions to Information Sheet 225 and the associated transitional framework for stablecoins, wrapped tokens, and digital asset intermediaries, received 51 non-confidential submissions from financial institutions, crypto service providers, consumer groups, and professional advisers.

The feedback has informed ASIC's decision to grant class no-action relief, extend transitional periods, and expand illustrative examples within the updated guidance to enhance clarity and implementation certainty. This comprehensive consultation process demonstrates ASIC's commitment to evidence-based policy development and collaborative regulatory design in the rapidly evolving digital asset sector.

### Key Consultation Outcomes: Part One



#### Stablecoins and Wrapped Tokens

The majority of respondents agreed that many stablecoins and wrapped tokens qualify as financial products under current Australian law, supporting transitional relief for unlicensed intermediaries managing such assets. This approach ensures continuity until the Government's proposed Digital Assets and Payments (DAP) reforms take effect.



#### Class No-Action Position

Respondents broadly supported ASIC's class no-action position, recommending inclusion of historical conduct and longer transition periods of up to 24 months. ASIC issued a class no-action letter offering temporary non-enforcement of licensing breaches under the Australian Financial Services (AFS), Australian Market, and Clearing and Settlement (CS) frameworks.

ASIC confirmed it will introduce illustrative examples in INFO 225 covering non-yield-bearing stablecoins and wrapped tokens, alongside class relief for secondary distributors of eligible assets. Further consultation is ongoing through Consultation Statement 32 (CS 32), open until 12 November 2025, covering stablecoins, wrapped tokens, and omnibus accounts for digital asset custody.

The lodgement window for AFS licence applications closes on 30 June 2026. The no-action position excludes crypto lending, earn products, and most crypto derivatives, except wrapped tokens. ASIC stressed that enforcement will continue in cases of fraud, systemic misconduct, or consumer harm, maintaining regulatory vigilance whilst facilitating orderly transition.

### **Key Consultation Outcomes: Part Two**

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#### **Expanded Illustrative Examples**

Industry participants acknowledged the usefulness of examples clarifying when a digital asset qualifies as a financial product but sought greater depth and coverage. ASIC updated INFO 225 to include five new examples: bitcoin, native proof-of-stake staking, tokenised real estate, wrapped tokens, and non-interest-bearing stablecoins.

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#### **Custodial Standards Clarification**

Feedback indicated strong agreement that INFO 225 should extend to digital asset custodians and depository service providers. ASIC reaffirmed that existing custodial standards apply across all financial products, irrespective of technological form, adopting a principles-based approach.

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#### **Operational Challenges Addressed**

Respondents identified ongoing operational hurdles, including custodian capital requirements, trust account rules amidst debanking, and difficulty obtaining professional indemnity insurance. Some noted challenges in applying design and distribution obligations (DDO) to decentralised products without clear issuers.

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#### **Legislative Timing Considerations**

Industry views were divided on whether ASIC should delay updates pending DAP legislation. Some urged closer alignment with international standards, whilst others favoured Australia-specific rules addressing decentralised finance (DeFi) and smart contracts.

ASIC also revised five existing examples, including managed staking, yield-bearing stablecoins, and new blockchain structures. Informal consultations with key stakeholders ensured these examples reflect real-world use cases and practical application. The regulator proposed relief for omnibus account arrangements to facilitate pooled client custody, with submissions remaining open until 12 November 2025.

# ASIC Clarifies Regulatory Framework for Digital Assets and Grants Transitional Relief to Support Innovation

On 29 October 2025, the Australian Securities and Investments Commission (ASIC) issued <u>updated guidance</u> extending Information Sheet 225 – <u>Digital Assets: Financial Products and Services (INFO 225)</u> to clarify how existing financial services laws apply to digital assets. The update reinforces investor protection whilst supporting innovation in Australia's expanding digital economy.

ASIC also introduced a sector-wide no-action position effective until 30 June 2026 and proposed targeted relief for stablecoin, wrapped token, and digital asset custodians to ensure an orderly transition to the forthcoming Digital Assets and Payments (DAP) legislative framework. This comprehensive approach balances regulatory certainty with flexibility, enabling market participants to prepare for compliance whilst continuing to operate during the transitional period.

## Framework Details and Strategic Context

#### Scope of INFO 225

ASIC states that stablecoins, wrapped tokens, tokenised securities, and digital asset wallets are classified as financial products under current law. The updated INFO 225 extends prior versions (2017, 2018, 2019, and 2021) and now explicitly applies to real-world asset tokenisation, stablecoin issuance, and digital custody arrangements.

#### **Transitional Support**

To support compliance readiness, ASIC announced a sector-wide no-action position providing temporary regulatory flexibility until mid-2026. The measure allows firms time to assess licensing obligations and apply for necessary authorisations. Proposed relief instruments also cover stablecoin and wrapped token distributors, and digital asset custodians.

#### DAP Reform Alignment

The updated INFO 225 operates in view of the Australian Government's DAP reforms, clarifying what constitutes a financial product or service under existing law. It complements parallel regulatory developments, including exemptions granted for the Reserve Bank of Australia's Project Acacia, which explores wholesale tokenised asset markets.

All entities offering, dealing, or advising in such products must hold an Australian Financial Services (AFS) licence or operate under a recognised exemption. Public consultation on proposed relief instruments remains open until 12 November 2025, enabling continued stakeholder input into the final regulatory architecture.

## **Consultation Outcomes and Implementation**

#### **Consultation Heritage**

The new guidance incorporates outcomes from Consultation Paper 381 – Updates to INFO 225: Digital Assets: Financial Products and Services, released in December 2024. The consultation examined whether certain digital assets constitute financial products, corresponding licensing requirements, and transitional relief mechanisms. Stakeholder responses directly shaped ASIC's final approach and the examples included in the revised guidance.

ASIC stated that many widely traded digital assets are already financial products under Australian law and will remain so under forthcoming reforms. As a result, providers must hold an AFS licence. Whilst ASIC will consider the no-action period when evaluating past conduct, it will continue to pursue enforcement actions in cases of systemic harm or fraud.

#### Commissioner's Perspective

ASIC Commissioner Alan Kirkland stated: "Distributed ledger technology and tokenisation are reshaping global finance. ASIC's guidance provides the regulatory clarity that firms have been calling for to innovate confidently in Australia."

He added: "Many widely traded digital assets are financial products under current law and will remain so under the Government's proposed law reform, meaning many providers require a financial services licence. Licensing ensures consumers receive the full suite of protections under the law and allows ASIC to act when poor practices lead to harm."

The updated INFO 225 and associated relief measures take immediate effect from 29 October 2025. The no-action period extends through 30 June 2026, providing firms with a defined window to adapt their operations, apply for necessary licences, and implement compliance frameworks aligned with ASIC's expectations and the evolving regulatory landscape.

## Monetary Authority of Singapore Announces Finalists for the 2025 Global FinTech Hackcelerator and FinTech Excellence Awards

On 21 October 2025, the Monetary Authority of Singapore (MAS) announced the 42 finalists for the **2025 Global FinTech Hackcelerator** and the **Singapore FinTech Festival (SFF) FinTech Excellence Awards**. The winners will be revealed at the SFF FinTech Excellence Awards Dinner on 13 November 2025, marking ten years of Singapore's leadership in global fintech innovation.

The Hackcelerator, organised by MAS in partnership with the Global Finance Technology Network (GFTN), centres on the theme "Artificial Intelligence (AI) for Financial Services", showcasing transformative AI applications designed to reshape wealth management, SME financing, risk analytics, and regulatory compliance. This year's competition demonstrates how AI-driven innovation can enhance financial services whilst maintaining robust governance and regulatory oversight.

## Hackcelerator Solutions and Excellence Award Categories

#### AI-Based Solutions

The 2025 Global FinTech Hackcelerator features 18 pioneering AI-based solutions, each developed to tackle critical industry challenges. Every finalist has been paired with an industry mentor to refine their solutions ahead of Demo Day on 12 November 2025, where the top three teams will receive \$\$80,000 each and potential pilot collaborations.

#### **Notable Finalists**

ActuaViz (Taiwan) uses AI to convert complex regulatory data into machine-readable formats; Akro (Singapore) builds secure AI research platforms; Boost.Money (India) leverages AI-driven analytics to simplify SME credit decisioning; and U-Reg (Singapore) automates compliance workflows, accelerating Source of Wealth verification by up to 80%.

#### **Excellence Awards**

The SFF FinTech Excellence Awards, jointly organised by MAS, the Singapore FinTech Association (SFA), and PwC Singapore, celebrate Singapore's fintech evolution. The 2025 awards received over 150 entries across five corporate categories and one individual honour, FinTech Mentor of the Year.

The AI theme aligns with MAS's strategic initiatives such as Project Veritas and Project Guardian, which aim to integrate fairness, ethics, and accountability into the adoption of AI in finance. Industry mentors include BNP Paribas, Mastercard, and Prudential AI Lab, ensuring finalists receive expert guidance on commercial viability and regulatory alignment.

Solutions like LexisNexis IDVerse for AI-powered identity verification, Cynopsis Solutions for global KYC compliance, and WeavInsight for climate-risk analytics demonstrate how technology supports ESG objectives, risk mitigation, and digital governance in the fintech ecosystem. These innovations exemplify how regulatory trust and rapid technological innovation can co-exist within a transparent governance framework.

## Monetary Authority of Singapore launches BLOOM Initiative to Extend Settlement Capabilities

On 16 October 2025, the Monetary Authority of Singapore (MAS) launched <u>BLOOM — Borderless, Liquid, Open, Online, Multi-currency</u> initiative to enhance digital settlement capabilities across Singapore's financial system. BLOOM builds upon Project Orchid (2021), which explored a digital Singapore dollar, and now extends its scope to enable multi-currency settlement through tokenised bank liabilities and well-regulated stablecoins.

BLOOM establishes a regulated interoperability framework for digital settlements focusing on tokenised bank liabilities and regulated stablecoins. Compliance automation is embedded through programmable controls and the Programmable Compliance Toolkit, developed under Singapore's Global Layer One (GL1) initiative. BLOOM integrates governance, risk management, and regulatory reporting into transaction protocols, using "programmable compliance" to ensure AML/CFT and cross-border regulatory checks are performed at the technical layer, representing a significant advancement in regulatory technology integration.

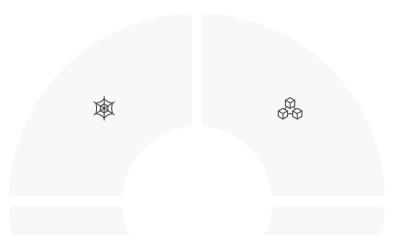
## **BLOOM Consortium and Strategic Architecture**

#### **Global Participants**

BLOOM brings together Circle, DBS, OCBC,
UOB, Partior, Stripe, Coinbase, Ant
International, and StraitsX. These
institutions will collaborate on
interoperability, compliance automation,
and AI-enabled agentic payments.



BLOOM complements Project Orchid (digital Singapore dollar), Project Guardian (asset tokenisation), and Global Layer One (programmable compliance standards).



#### **Open Participation**

MAS has invited further participation from financial institutions and clearing networks to co-develop standards, marking a policy shift from regulatory observation to regulatory co-creation.

#### **Multi-Currency Support**

BLOOM supports multi-currency settlement across G10 and Asian currencies, integrating digital settlement into both domestic and cross-border payment infrastructures.

The initiative creates a cohesive ecosystem linking currency innovation, tokenised assets, and compliance automation. By establishing standardised frameworks for programmable compliance, BLOOM enables financial institutions to embed regulatory requirements directly into transaction protocols, reducing operational friction whilst maintaining robust oversight and governance standards across participating jurisdictions.

## **Agentic Payments and Implementation Timeline**

#### **Agentic Payments Innovation**

BLOOM pioneers the concept of agentic payments—transactions autonomously initiated and executed by AI agents under predefined rules. This approach exemplifies MAS's forward-looking policy direction in machine-led finance, integrating AI with regulatory oversight. By embedding such capabilities, BLOOM supports corporate treasury management, trade finance, and cross-border liquidity operations.

**Development Timeline** 

- 2021: Launch of Project Orchid to prototype a digital Singapore dollar
- **2022–2024:** Over ten trials completed; industry reports released on programmable rewards and conditional payments
- **2025:** Launch of BLOOM to extend tokenised and stablecoin settlement across currencies

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**Completed Trials** 

**Project Orchid trials** 

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Consortium Members

Leading institutions

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#### Secure Settlement

Enable settlement using tokenised bank liabilities and regulated stablecoins

#### **Compliance Frameworks**

Develop standardised compliance using programmable controls

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#### AI Integration

Integrate AI-driven agentic payment systems

#### **Enhanced Efficiency**

Improve multi-currency and cross-border settlement

BLOOM establishes MAS's principles-based regulation combining prudential oversight with controlled experimentation, embedding programmable compliance and permitting tokenised assets within a supervised environment, creating a long-term architecture for regulated decentralisation that balances innovation with stability and consumer protection across Singapore's evolving digital financial ecosystem.

## Monetary Authority of Singapore Consults on Enhanced Investor Recourse for Market Misconduct – Proposed Civil Compensation Framework

On 24 October 2025, the Monetary Authority of Singapore (MAS) issued a <u>Consultation Paper on Measures to Enhance Investor Recourse</u>

<u>Avenues in Market Misconduct Cases</u>, proposing a civil compensation framework to enhance investor recourse for losses arising from market misconduct. Following recommendations of the Equities Market Review Group, the framework aims to strengthen investor protection, promote confidence in Singapore's equities markets, and address barriers preventing retail investors from pursuing legitimate claims.

The proposed framework introduces structural mechanisms to simplify litigation, improve access to funding, and facilitate collective representation, all whilst embedding safeguards against frivolous or opportunistic lawsuits. This comprehensive reform demonstrates MAS's commitment to creating a fair, transparent, and accessible system of investor redress that complements its existing enforcement powers under the Securities and Futures Act 2001 (SFA).

## Proposed Framework: Three Key Pillars



## Designated Representative Mechanism

Under current laws, collective investor actions are constrained by coordination difficulties. MAS proposes introducing a Designated Representative Mechanism, allowing an independent, court-approved entity to organise and represent investors in civil proceedings. To ensure integrity, designated representatives must have no financial interest or conflict of interest and meet eligibility and governance standards set by MAS.



## Grant Scheme for Litigation Funding

Recognising that litigation costs remain a significant deterrent for retail investors, MAS proposes a grant scheme to co-fund credible investor actions. The scheme would cover a portion of litigation expenses, including expert testimony and financial analysis, through co-payment arrangements and strict governance controls. This ensures that only meritorious claims receive support, balancing investor empowerment with prudential oversight.



#### **Expanded Piggyback Claims**

MAS seeks to amend existing "piggyback claim" provisions under the SFA, which currently allow investors to seek compensation only after a criminal conviction or civil penalty order. The proposed refinements would extend claim eligibility, simplify procedural requirements, ease the burden of proof of reliance, and remove statutory compensation caps.

This mechanism is designed to reduce transaction costs, promote fair representation, and streamline proceedings whilst maintaining judicial oversight. The funding model encourages legitimate claims whilst disincentivising speculative litigation that could undermine market stability. The framework expands Singapore's investor protection regime and complements MAS's enforcement powers, bridging the gap in private recourse for individual investors affected by market misconduct.

## **Procedural Refinements and Policy Timeline**

#### **Extended Eligibility**

Extend claim eligibility to include default judgments, consent orders, and settlements involving admissions of liability

#### **Simplified Procedures**

Simplify procedural requirements to reduce legal complexity and delays in bringing claims

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#### Reduced Burden

Ease the burden of proof of reliance in cases involving misleading statements or omissions

#### **Uncapped Damages**

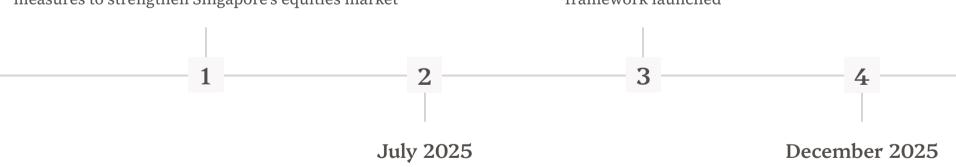
Remove statutory compensation caps, giving courts full discretion to determine damages based on case-specific evidence

#### February 2025

Equities Market Review Group announced initial measures to strengthen Singapore's equities market

#### October 2025

Public consultation on civil compensation framework launched



MAS signalled intention to enhance investor recourse and broaden retail protection

Consultation feedback deadline: 31 December 2025

These adjustments aim to make investor claims more practical and proportionate whilst aligning private recourse with public enforcement outcomes. The consultation embeds civil accountability into MAS's market integrity framework, introducing mechanisms for collective action, shared funding, and procedural simplification that balance investor empowerment with market stability and confidence in Singapore's capital markets.

# Public Safety in Money Matters: Critical Financial Services and the Digital Euro – A Central Bank Resilience Perspective

On 9 October 2025, the European System of Central Banks (ESCB) published a <u>Public Safety in Money Matters: Critical Financial Services and the Digital Euro</u> and reaffirmed its adherence to the FX Global Code, the international standard of conduct for foreign exchange (FX) markets. The Code, originally launched in 2017 and updated in December 2024, articulates the principles of fairness, transparency, and integrity that underpin ethical FX trading.

By renewing their Statements of Commitment, the European Central Bank (ECB) and all national central banks within the ESCB have ensured internal policies and operational frameworks fully comply with the revised Code. The reaffirmation strengthens market integrity, promotes ethical behaviour across the FX ecosystem, and reinforces confidence in the effectiveness of monetary policy transmission through well-governed financial markets, demonstrating continued leadership in upholding global standards of market conduct.

## FX Global Code Framework and ESCB Leadership

#### **Code Structure and Principles**

The FX Global Code, maintained by the Global Foreign Exchange Committee (GFXC), is a voluntary set of principles promoting sound governance and best practices in global FX markets. Although non-binding, it operates as a self-regulatory framework complementing statutory laws and supervisory regimes.

The Code is structured around six key dimensions: ethics, governance, execution, information sharing, risk management, and confirmation and settlement. These principles establish a comprehensive framework for responsible market participation and disciplined risk governance in FX activities.

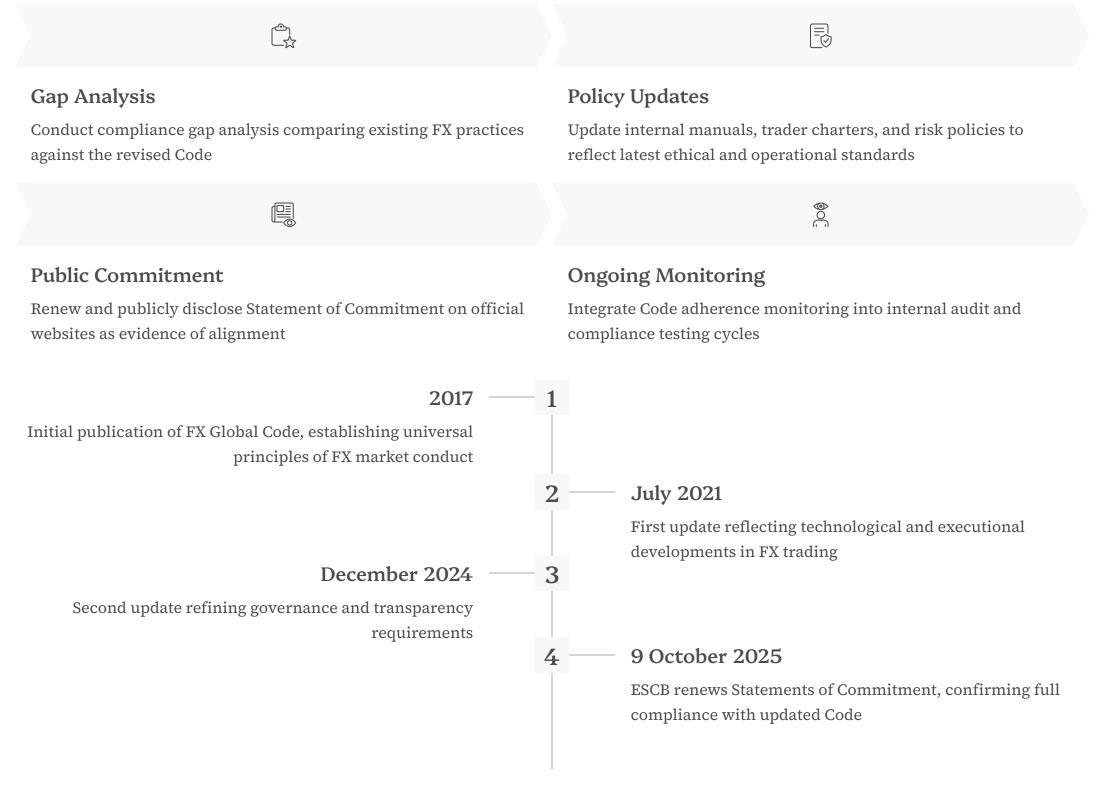
#### **Market Expectations**

Financial institutions active in FX markets, including banks, dealers, asset managers, and corporates, are expected to align their internal policies with the Code's principles. The ESCB's leadership effectively transforms voluntary adherence into a benchmark of responsible participation.

Firms that mirror the ESCB's compliance standards strengthen their credibility and resilience against misconduct risks. The ESCB's renewal demonstrates continued leadership in upholding ethical market conduct and signals to both public and private market participants that adherence to the Code remains a continuous responsibility.

The December 2024 revision of the FX Global Code introduced enhanced provisions on governance, transparency, and data integrity. The renewal ensures that internal operations within EU central banks align with globally accepted principles of conduct, thereby enhancing transparency, market discipline, and investor trust across Europe's currency markets, supporting both market integrity and effective monetary policy implementation.

## Implementation Roadmap and Institutional Takeaways



Institutions should require and document counterparties' compliance commitments as part of relationship and due diligence processes. These actions collectively ensure consistency between ethical standards, internal governance, and supervisory expectations. Short term: integrate the December 2024 updates into FX governance frameworks. Medium term: embed adherence monitoring within compliance oversight structures. Long term: sustain disciplined conduct across the FX ecosystem, ensuring markets remain transparent, ethical, and resilient, thereby supporting effective monetary policy implementation.

The ESCB's renewal confirms that ethical conduct and operational transparency are indispensable to the stability of global FX markets. By maintaining alignment with the FX Global Code, central banks and market participants collectively reinforce the foundations of fair, orderly, and efficient currency markets that serve the broader financial system and support confidence in monetary policy effectiveness across jurisdictions.