SPACE FINANCIAL SERVICES AUTHORITY

SFSA

INTERIM GUIDANCE NOTE

IGN-004

SFSA Public Register — Listing and Maintenance Procedures

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Supersedes	N/A — inaugural register procedures
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Applies to	All SFSA-Authorised Institutions and Applicants
Read alongside	SFSA IGN-001, IGN-002

Executive Summary

This Interim Guidance Note (IGN-004) sets out the procedures for the SFSA Public Register of Authorised Institutions — the definitive, publicly accessible record of all entities holding current SFSA Authorisation. The Public Register is a cornerstone of the SFSA's regulatory framework: it gives clients, counterparties, and the public the ability to verify the regulatory status of any institution claiming SFSA Authorisation, and it provides the SFSA with a real-time record of the regulated population.

IGN-004 covers: the purpose and legal basis of the Register; the information held on the Register; the process for initial listing; ongoing maintenance obligations; the consequences of inaccurate Register information; and the procedure for de-listing upon suspension or revocation of SFSA Authorisation.

NOTE The SFSA Public Register is a public document, accessible without charge at sfsa.org/register. Any person may search the Register to verify whether a named institution holds current SFSA Authorisation. SFSA-Authorised Institutions may not request the suppression of their Register entry.

Section 1 — Purpose and Legal Basis

1.1 Purpose of the Public Register

The SFSA Public Register serves four purposes:

- Public accountability — enabling clients, counterparties, journalists, regulators, and the public to verify in real time whether any institution claiming SFSA Authorisation actually holds it
- Regulatory oversight — providing the SFSA Secretariat with a maintained record of the regulated population, their authorised activities, and their regulatory status
- Market integrity — preventing unauthorised use of the SFSA Authorisation mark by institutions that have not been assessed and approved
- International credibility — providing UNOOSA, IOSCO, FSB, and national regulators with a verifiable and current list of SFSA-regulated entities for the purposes of cross-border regulatory cooperation

1.2 Legal Basis

The Public Register is established pursuant to Article 5 of the SFSA Association Statutes, which empowers the SFSA to maintain a public register of all SFSA-Authorised Institutions, and pursuant to IGN-001 Section 8.3, which sets out the institution's obligation to notify the Secretariat of any change to the information held on the Register.

PLAIN TERMS The Public Register exists under Article 5 of the SFSA Association Statutes. Your obligation to keep your entry updated comes from IGN-001, Section 8.3.

1.3 The Register as the Authoritative Source

The SFSA Public Register is the sole authoritative source of information on SFSA Authorisation status. In the event of any inconsistency between information on the Register and information provided by a purported SFSA-Authorised Institution in its own materials, the Register prevails. Clients and counterparties are encouraged to verify Register status before relying on any claim of SFSA Authorisation.

PLAIN TERMS The Public Register is the final word on who holds SFSA Authorisation. If an institution's own marketing says something different from the Register, the Register wins. Always check the Register yourself before relying on any claim of SFSA Authorisation.

Section 2 — Information on the Register

2.1 Mandatory Register Fields

The following information is held on the Public Register for every SFSA-Authorised Institution:

SFSA Authorisation Number	Unique reference number assigned at grant — format: SFSA-AUTH-[year]-[sequential number]
Full legal name	Exact legal name as registered in the institution's home jurisdiction
Trading name(s)	Any trading name under which the institution conducts Space Economy Financial Services
Legal form	e.g. AG, SA, UAB, Ltd, bank, EMI, payment institution
Jurisdiction of incorporation	Country and, where relevant, canton or state
Registered address	Full registered address — not PO Box
Principal contact	Name and email address of the designated SFSA contact person (may be the MLRO or Compliance Officer)
Authorised activities	The specific Space Economy Financial Services authorised under the SFSA Authorisation — as per the SFSA Authorisation Agreement (IGN-002, Template D)
Date of authorisation	Date SFSA Authorisation was first granted
Date of most recent renewal	Date of most recent annual renewal
Authorisation status	Active / Suspended / Revoked
National regulatory licences	National financial regulatory licences held — regulator, licence type, licence number, and jurisdiction
Conditions	Any conditions attached to the SFSA Authorisation — or 'None' if unconditional
Sandbox status	Whether the institution holds SFSA Sandbox Authorisation — Yes / No, with sandbox expiry date if applicable

2.2 Non-Public Register Information

The following information is held by the SFSA Secretariat for internal regulatory purposes but is not displayed on the Public Register:

- Fit-and-proper declarations of individual directors and senior managers
- AML/CFT policy documentation
- Financial statements and capital adequacy information
- SAR filing history
- Internal compliance correspondence

This information may be shared with national regulators and financial intelligence units where legally required or where the SFSA has entered into a cooperation arrangement with the relevant authority.

Section 3 — Initial Listing on the Register

3.1 Listing upon Grant of Authorisation

Upon the Council's decision to grant SFSA Authorisation to an applicant, the SFSA Secretariat will:

1. Assign a unique SFSA Authorisation Number in the format SFSA-AUTH-[YYYY]-[NNN]
2. Create the Register entry using the information provided in the Authorisation application (IGN-002 Template A)
3. Share the draft Register entry with the institution for verification — the institution has 5 business days to identify and flag any factual error
4. Publish the Register entry on sfsa.org/register within 10 business days of the authorisation decision
5. Issue the SFSA Authorisation Certificate to the institution — a formal document confirming SFSA Authorisation, carrying the SFSA seal and Secretary General's signature
6. Issue the SFSA Authorisation mark in digital format — for use on the institution's website, client materials, and marketing in accordance with the SFSA Brand Guidelines

3.2 SFSA Authorisation Certificate

The SFSA Authorisation Certificate issued to each Authorised Institution will contain:

- The SFSA seal and official header
- The institution's full legal name and SFSA Authorisation Number
- The authorised activities — as defined in the Authorisation Agreement
- The date of authorisation and renewal date
- Any conditions attached to the authorisation
- The Secretary General's signature
- A QR code linking directly to the institution's Register entry — enabling instant digital verification

3.3 SFSA Authorisation Mark

The SFSA Authorisation Mark — a visual logo mark — may be used by SFSA-Authorised Institutions on their website, client-facing materials, and marketing, subject to the following conditions:

- The mark may only be used while the institution holds active, unsuspended SFSA Authorisation

- The mark must be accompanied by the prescribed SFSA disclosure text (IGN-001 Section 7.2) on the institution's website homepage and in its terms and conditions
- The mark must not be modified, recoloured, or combined with other marks in a way that implies it is a national banking licence or regulatory approval from a sovereign authority
- Upon suspension or revocation of SFSA Authorisation, the mark must be removed from all materials within 5 business days

REQUIREMENT Unauthorised use of the SFSA Authorisation Mark — by institutions that have never held SFSA Authorisation, or by formerly Authorised Institutions whose authorisation has been suspended or revoked — constitutes fraud. The SFSA will pursue all available legal remedies against unauthorised mark users and will publish a notice on sfsa.org identifying the unauthorised use.

Section 4 — Ongoing Register Maintenance

4.1 Institution's Obligation to Notify

Under IGN-001 Section 8.2, every SFSA-Authorised Institution must notify the SFSA Secretariat promptly — and in any event within 5 business days — of any change to the information held on the Register. The following changes specifically require immediate notification:

- Change of legal name or trading name
- Change of registered address or principal place of business
- Change of jurisdiction of incorporation (e.g. re-domiciliation)
- Change of legal form (e.g. conversion from EMI to bank)
- Change in or addition to national financial regulatory licences held
- Change in authorised activities — expansion or restriction of services
- Change of designated SFSA contact person
- Any change in the conditions attached to the SFSA Authorisation
- Change in sandbox status — exit from sandbox or extension of sandbox period

PLAIN TERMS Something on your Register entry changed? Tell the SFSA Secretariat within 5 business days.

4.2 Annual Register Verification

As part of the annual Regulatory Report (IGN-001 Section 8.1), every SFSA-Authorised Institution must submit a signed Register Verification Statement confirming that all information on the Register is accurate and complete as of the date of the statement, or identifying any corrections required. The Register Verification Statement must be signed by a director or the designated Compliance Officer.

4.3 SFSA Secretariat Maintenance

The SFSA Secretariat will review and update the Register upon:

- Receipt of a change notification from an SFSA-Authorised Institution
- Receipt of the annual Register Verification Statement
- A decision by the Council to grant, renew, condition, suspend, or revoke an SFSA Authorisation
- Information received from a national regulator or financial intelligence unit that is material to Register accuracy
- The annual Register audit conducted by the Head of Operations

4.4 Annual Register Audit

The SFSA Secretariat will conduct an annual internal audit of the Register, cross-checking all Register entries against:

- Information held in the Secretariat's files for each Authorised Institution
- National commercial register extracts and public regulatory databases
- SFSA-Authorised Institutions' websites — to verify correct use of the SFSA Authorisation Mark and disclosure text
- Annual Regulatory Reports submitted by Authorised Institutions

Any discrepancies identified in the audit will be raised with the relevant institution for correction within 10 business days. Persistent failure to correct Register information is grounds for suspension of SFSA Authorisation.

Section 5 — Suspension and Revocation — Register Consequences

5.1 Suspension

When the Secretary General suspends an SFSA Authorisation pursuant to IGN-001 Section 10.1, the following Register actions are taken immediately:

- The institution's status is changed to 'Suspended' on the Public Register
- The date of suspension and a brief statement of the general grounds for suspension ('Pending compliance review' or equivalent — without disclosing confidential regulatory information) are added to the Register
- The institution is notified that it must immediately remove the SFSA Authorisation Mark from all materials and cease describing itself as SFSA-Authorised until the suspension is lifted
- The suspension is noted on the SFSA website homepage — a 'Recent Register Changes' notice is published

5.2 Revocation

When the Council revokes an SFSA Authorisation pursuant to IGN-001 Section 10.2, the following Register actions are taken:

- The institution's status is changed to 'Revoked' on the Public Register
- The date of revocation is added, together with a brief statement of grounds where the Council has determined disclosure is appropriate
- The Register entry is retained for a minimum of 5 years after revocation — for historical reference and public protection purposes
- A 'Register Change Notice' is published on the SFSA website
- The institution must remove all SFSA Authorisation Marks and references within 5 business days of revocation

5.3 Re-application after Revocation

An institution whose SFSA Authorisation has been revoked may re-apply after a minimum cooling-off period of 12 months from the date of revocation. Re-applications are assessed against the standard IGN-002 process, but the prior revocation history is a material consideration in the assessment. The Council must approve all re-applications following a prior revocation — no delegation to the Secretary General is permitted.

PLAIN TERMS If your SFSA Authorisation was revoked, you can re-apply after 12 months. We assess your re-application the normal way, but your revocation history counts. The Council decides these personally — the Secretary General cannot approve a re-application on the Council's behalf.

Section 6 — The Register in Practice — Space Bank AG

Space Bank AG's inaugural Register entry, upon grant of SFSA Authorisation, will be structured as follows:

SFSA Authorisation Number	SFSA-AUTH-2025-001
Full legal name	Space Bank AG
Trading name	Space Bank
Legal form	Aktiengesellschaft (AG) — Swiss corporation
Jurisdiction of incorporation	Switzerland — Canton of Zug
Registered address	[Zug registered address]
Authorised activities	Private banking; retail and commercial banking; investment banking; deposit-taking; payments; foreign exchange; trade finance — exclusively for space economy clients
Date of authorisation	[Date]
Authorisation status	Active
National regulatory licences	FINMA Regulatory Sandbox (Art. 6 BankO) — notification filed [date]
Conditions	Operating under FINMA sandbox — maximum CHF 1,000,000 total deposits; no interest on deposits; client disclosure of sandbox status required
Sandbox status	SFSA Sandbox Authorisation — Yes; expiry: [18 months from authorisation date]

NOTE The Register entry for Space Bank AG will be updated progressively as its regulatory status evolves — upon grant of FINMA FinTech Licence, the sandbox conditions will be removed and the national licence entry updated. Upon exit from SFSA Sandbox Authorisation, the sandbox status field will be updated to 'No'.

SPACE FINANCIAL SERVICES AUTHORITY

The world's first financial regulatory body dedicated to the space economy

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