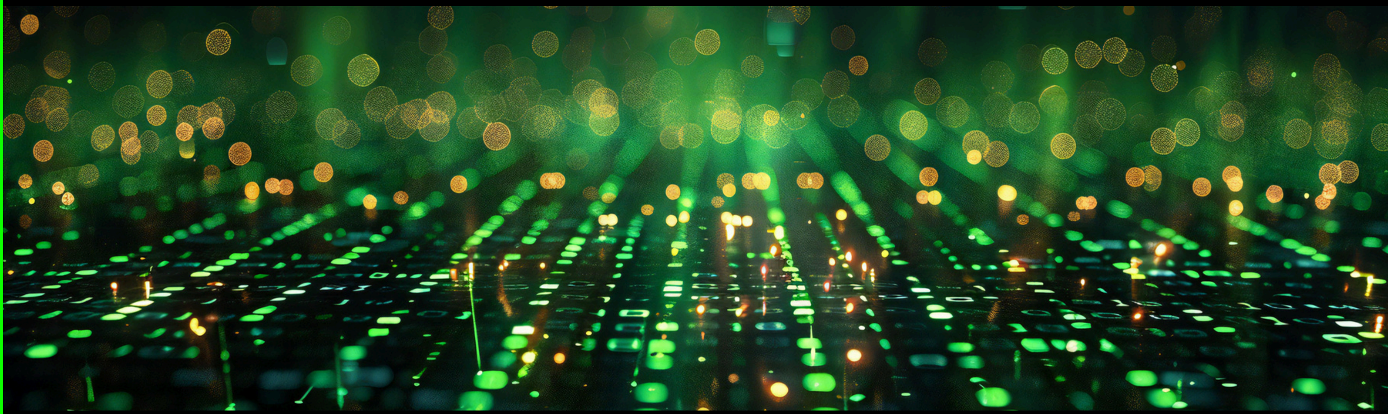
Scale Compliance

02 May 2026



Welcome to Scale Compliance's

NEWSLETTER

🚨 Dubai Sets the Standard: VARA Defines the New Issuance Framework

ubai's Virtual Assets Regulatory Authority (VARA) has published a comprehensive framework for digital asset issuances, establishing three clear pathways: licensed issuances, distributor-facilitated issuances, and exempt virtual assets with reduced regulatory requirements.

💡 What it Means for Compliance

Whitepapers and risk disclosures are no longer marketing documents. They are regulatory instruments. Issuers must think like regulated financial institutions from day one, including reserve requirements, redemption rights, and legal structuring.

🔍 Scale Insight

Dubai is positioning itself as a jurisdiction where regulation and innovation scale together. Firms that build governance structures aligned with this framework today have a clear advantage over competitors in less regulated markets.

🧭 Actionable Takeaway

Assess which issuance category your digital assets fall under. Ensure disclosure documents and governance structures meet VARA requirements before regulators ask the question.

🏦 CHF Stablecoin: Swiss Banks Test the Future of Digital Money

UBS, PostFinance, Sygnum, Raiffeisen, ZKB, and BCV, together with Swiss Stablecoin AG, are testing a CHF stablecoin in a controlled sandbox environment. Rather than waiting for full regulatory clarity, they are actively building the infrastructure for programmable money.

💡 What it Means for Compliance

Stablecoins are evolving into core financial infrastructure. Compliance is not an afterthought here, it is engineered into the transaction itself: controlled access, transaction limits, and defined participant groups demonstrate that trust is built upfront.

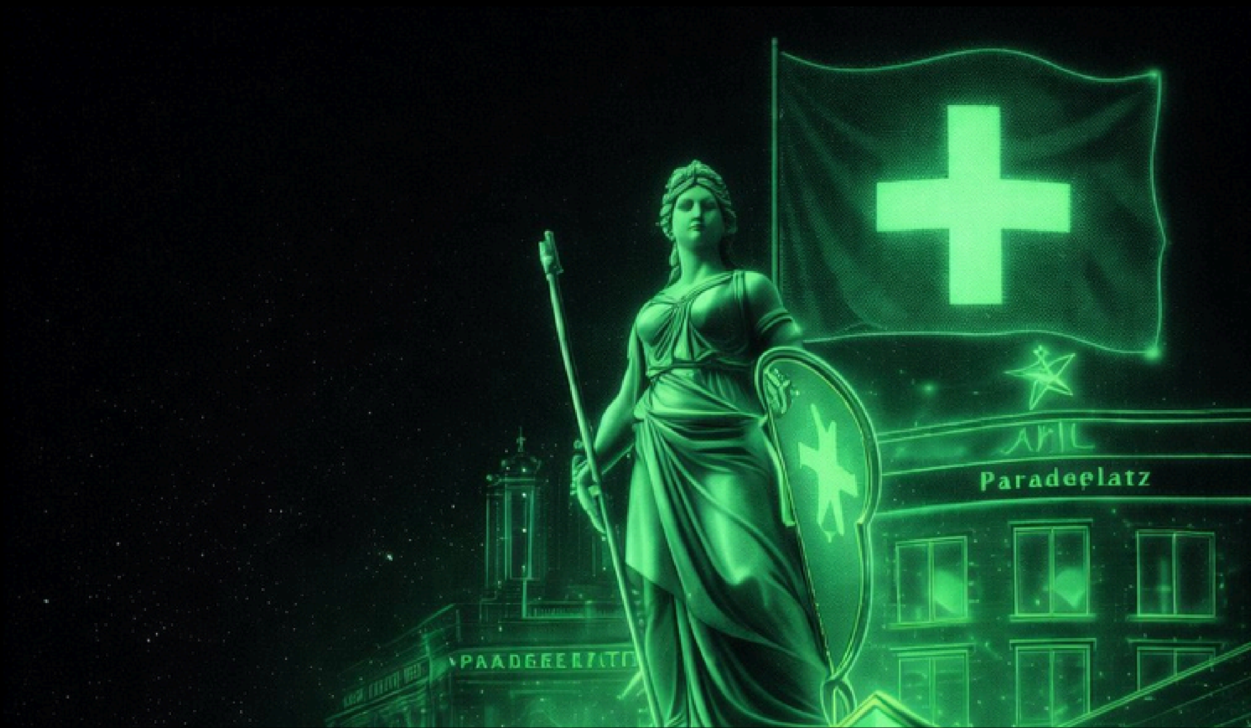
🔍 Scale Insight

This is not a pilot. It is a blueprint. Institutions without a stablecoin strategy today will tomorrow rely on infrastructure built by others, with no influence over the standards it sets.

🧭 Actionable Takeaway

Assess how programmable payments affect your existing compliance processes. Transaction monitoring, KYC requirements, and AML controls must be compatible with on-chain logic.

⚠️ FINMA Guidance 02/2026: Digital Fraud is now a Governance Issue



FINMA's Guidance 02/2026 makes one thing clear: digital fraud risk is no longer an IT issue. It is embedded in core regulatory expectations for banks and fintech institutions, with governance, accountability, and supervisory scrutiny at the center.

💡 What it Means for Compliance

Institutions must demonstrate effective controls, not just document them. Key focus areas include digital client onboarding as a primary control point, real-time monitoring over static checks, and clear escalation pathways when fraud activity increases materially.

🔍 Scale Insight

The shift is structural: from policy-driven frameworks toward continuously validated risk management. Supervisors are no longer asking whether a framework exists. They are asking whether it works.

🧭 Actionable Takeaway

Ensure digital fraud risk has clearly defined ownership at senior management level. Actively test the effectiveness of your onboarding controls and make sure escalation processes are documented and audit-ready.

📌Takeaway

April 2026 highlights a clear shift across jurisdictions: regulatory frameworks are becoming more prescriptive, and the bar for what constitutes adequate compliance is rising fast.

For financial institutions and digital asset firms, the priorities are clear:

- Align digital asset issuance structures with jurisdiction-specific frameworks such as VARA before regulators enforce
- Build stablecoin and programmable payment strategies now, not after infrastructure standards are set by others
- Treat digital fraud risk as a governance issue with documented ownership at senior management level, not as an IT control

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