



Enabling global identity
Protecting digital trust

verifiable LEI (vLEI)

Ecosystem Governance Framework v4.0

vLEI Issuer Qualification Agreement

Appendix 3 vLEI Issuer Qualification Program

Checklist

Public

Document Version 1.6

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Read-only Document

Candidates: This document may be used to facilitate the drafting of responses to this Checklist. Formal responses must be submitted through the SurveyMonkey form provided by the GLEIF Qualification Team.

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> Required Documentation to be Submitted

A Contact Details

Legal Name of vLEI Issuer | Note:

This name must match your LEI reference Data

[Text input field]

VAT No. if applicable

[Text input field]

URL of vLEI Issuer Organization

[Text input field]

Other Tax ID Number, If applicable

[Text input field]

LEI of vLEI Issuer Organization

[Text input field]

Submission Date (YYYY-MM-DD)

[Text input field]

Direct Parent/Grandparent/Owner/Governing Organization if applicable

[Text input field]

First Submission

Revised Submission

LEI of Direct Parent/Grandparent/Governing Organization if applicable

[Text input field]

Internal Project Manager

Name

[Text input field]

Title

[Text input field]

Email

[Text input field]

Phone

[Text input field]

Designated Authorized Representative

Name

[Text input field]

Title

[Text input field]

Email

[Text input field]

Phone

[Text input field]

Key Contact Operations

Name

[Text input field]

Title

[Text input field]

Email

[Text input field]

Phone

[Text input field]

Key Contact Finance

Name

[Text input field]

Title

[Text input field]

Email

[Text input field]

Phone

[Text input field]

The Checklist can be signed with the digital certificate of the Designated Authorized Representative or a Notarized Copy of the signature of the Designated Authorized Representative.

In submitting this vLEI Issuer application, I confirm that, to the best of my knowledge, my organization is in compliance with or is able to become compliant with the requirements reflected in the vLEI Issuer Credential Qualification Agreement, its appendices and the vLEI Ecosystem Governance Framework, as of the date of this document unless otherwise noted.

Designated Authorized Representative Signature

Date (YYYY-MM-DD)

E-Signature

[Text input field]

[Text input field]

Name

[Text input field]

Title

[Text input field]

Email

[Text input field]

Phone

[Text input field]

This document summarizes the information required to apply to the vLEI Qualification Program which will be submitted through an online tool provided by GLEIF at the launch of the vLEI Issuer Qualification Program.

> Required Documentation to be Submitted

Organizations that hold any of the following certificates – eIDAS ETSI EN 319 401, ETSI X-Ref, WEB-TRUST, ISO 20001 OR ISO 27001 – may be subject to a simplified Qualification Program, which would allow skipping certain sections of the vLEI Issuer Qualifications Program Checklist document, where applicable.

B Entity Structure

Organization Structure

For Parent and vLEI Issuer Applicant

- Government
- Private – For Profit
- Private – NonProfit
- Public-Listed
- Public-Non-Listed
- Not Applicable – there is no parent/owner
- Other

Accounting Framework Check as many as applicable

- US GAAP
- IFRS
- Other – Please specify*
- Unknown/Not Applicable

*Comments (if any)

Internal Controls Framework Check as many as applicable

- COSO
- COBIT
- ISO*
- Other – Please specify**
- Unknown/Not Applicable

* Please note the applicable standard and provide the certificate if you have been certified

**Comments (if any)

FISCAL YEAR (Please provide your business calendar)

—

Date (YYYY-MM)

Date (YYYY-MM)

> Required Documentation to be Submitted

B Entity Structure

External Audit Firm (if applicable)

First Name	Comments (if any)			
		Yes	No	Not Applicable
Are annual financial statements issued?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parent Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
vLEI Issuer Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Governmental/Regulatory Auditors (if applicable)

Organization	Comments (if any)			
		Yes	No	Not Applicable
Are annual financial statements issued?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parent Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
vLEI Issuer Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are periodic management letters/reports issued which could relate to vLEI Issuer services?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parent Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
vLEI Issuer Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
if yes, are these reports public record?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Internal Audit Group (if applicable)

Department	Comments (if any)			
		Yes	No	Not Applicable
Are financial/operational/IT scope audits performed?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parent Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
vLEI Issuer Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are periodic management letters/reports issued which could relate to vLEI Issuer services?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parent Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
vLEI Issuer Level		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
if yes, are these reports public record?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

> Required Documentation to be Submitted

B Entity Structure

External Consultants (if applicable)

	Yes	No	Not Applicable			
Have you engaged a third party to evaluate your business and/or IT operations/controls?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> Parent	<input type="radio"/> vLEI Issuer Level	<input type="radio"/> Both
Are any of these reports SSAE16 SOC Type 1 or equivalent?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> Parent	<input type="radio"/> vLEI Issuer Level	<input type="radio"/> Both
Are any of these reports SSAE16 SOC Type 2 or equivalent?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> Parent	<input type="radio"/> vLEI Issuer Level	<input type="radio"/> Both
Are any of these reports ISAE3402 or equivalent?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> Parent	<input type="radio"/> vLEI Issuer Level	<input type="radio"/> Both
Are any of these reports public record?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> Parent	<input type="radio"/> vLEI Issuer Level	<input type="radio"/> Both

Please specify the provider of service(s):

Comments (if any)

Please indicate to which area business, IT operations, IT controls on any copies of reports submitted.

> Required Documentation to be Submitted

C Organization Structure

Organization Structure	Government	Private For Profit	Private Non Profit	Public-Listed	Public Non-Listed
Type of Document	Applicability				
1. Prior Year Financial Statements (Parent/Owner)	N	Y	Y	Y	Y
2. Auditor/Regulator Letter(s)/Report(s) (Parent/Owner and vLEI Operations)	Y	N	N	Y	Y
3. Most Recent Annual Report – vLEI Issuer	N	Y	Y	Y	Y
4. Current Organization Chart for all vLEI Operations and complete list of all relevant third party service providers.	Y	Y	Y	Y	Y

Comments

Please note:

All documents should be provided as part of the vLEI Issuer Qualification Program Submission.

> Required Documentation to be Submitted

D Financial Data, Audits & General Governance

Financial Data, Audits & General Governance

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page number	Please check one			
General Questions – Going Concern – vLEI Issuer					
1. Has an independent audit of your financial statements been performed for your last completed fiscal year?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Audited financial statements (income statement, balance sheet, cash flows statement) for prior year. If your organization does not have audited statements, please provide your prior and current financials as maintained. Please explain how these statements are validated and reported.
2. Has an audit firm/government regulatory agency issued any management letters relating to vLEI Issuer Operations over the past three years/ - This would include commentary relating to internal controls, accounting controls and methods of procedures.		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Final Management Letters with management responses as applicable.
3. Do you have an internal audit function?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
4. Have you been subject to any regulatory audits/reviews in your current year's operations?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant comment letters, audit reports (qualified and unqualified opinions) and management responses as applicable
5. Do you have a formal vLEI Issuer Operations Budget for this year and next year's operations?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Please provide budgets and explain financial assumptions, volume estimations, operating budget, expenses etc. – soft copies should be submitted wherever possible.
6. Are you currently involved with any litigation matters which could affect vLEI Issuer services?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
7. Are you subject to regulatory compliance requirements which could affect vLEI Issuer operations?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
8. Do you clearly understand the requirements of the Annual vLEI Issuer Qualification?		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

> Required Documentation to be Submitted

E Pricing Model

Pricing Model

	Yes	No	Not Applicable
1. Do you intend to/do you charge fees for vLEI issuance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Do you intend to/do you charge fees for vLEI revocation?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Does your agreed business plan include transparent financial information and assumptions regarding the vLEI Issuer Services described in Section F?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Will/can you confirm that your organization will be/is solely responsible for managing the revenue that is produced and costs that are incurred in the running of your vLEI operations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Can you ensure that your operations regarding vLEIs will be/are sustainably financed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Based on your vLEI business model, plans and volume estimates for target vLEI customers, please provide your estimates of LEI's (for target customers that do not have LEIs) and vLEI volumes for this year and the next two years' operations (if you are answering the question in the 4th quarter of this year, then please indicate for the estimate of the next three years' operations) and a short description of the reason.			

> Required Documentation to be Submitted

F vLEI Issuer Services

vLEI Issuer Services

	Additional Documentation Requested Please provide brief narrative.
1. If you will charge for vLEI Issuance and/or revocation will/do you have a standard process for receiving payments from a Legal Entity?	
2. How will/do you ensure processing authorizations for issuance and revocation of vLEIs without delay?	
3. Will/do you have a process in place to verify that the Legal Entity Identifier (LEI) of the Legal Entity has an entity status of = "Active" and Registration status = "ISSUED", "PENDING_TRANSFER" or "PENDING_ARCHIVAL" in the Global LEI System?	
4. How will/do you inform the Legal Entity of needed amendments to their instructions or refusal to issue vLEIs?	
5. In the case of vLEI Credential Issuance, will/have you implemented the necessary Identity Verification requirements?	
6. Will/do you validate the name of the person and the Official Organizational Role of the Legal Entity Official Organizational Role vLEI Credential using one or more official public sources or by requesting from the LAR(s) copies of documents of the Legal Entity, such as Board minutes or resolutions, statutes or articles, which would validate the name and the role of the OOR Person?	
7. Will/do you confirm the long name of the Official Organizational Role of the OOR Person specified in the Qualified vLEI Issuer OOR Authorization vLEI Credential as required by the Legal Entity Official Organizational Role vLEI Credential Framework?	
8. Will/do you have processes and procedures to manage, research and validate incoming challenges regarding the name of a person and/or their Official Organizational Role in a Legal Entity OOR vLEI Credentials?	
9. Will/have you complied with the requirements defined for all vLEI services included in the Appendix 5 to the vLEI Issuer Qualification Agreement – Service Level Agreement (SLA)?	
10. Will/do you call the vLEI Reporting API for each issuance of Legal Entity vLEI Credentials and Legal Entity Official Organizational Role vLEI Credentials?	

> Required Documentation to be Submitted

F vLEI Issuer Services

Metrics

	Yes	No	Not Applicable
1. Will /do you have a process to monitor compliance with the Service Levels as defined in the vLEI Service Level Agreement (Appendix 5)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Revocation Legal Entity vLEIs

	Yes	No	Not Applicable
1. Will/do follow the policies for revocation of vLEI Credentials specified in the vLEI Ecosystem Governance Framework, including notifying GLEIF of revocations of Legal Entity vLEI Credentials and Legal Entity OOR vLEI Credentials?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Will/do you have a process to check the status of the LEIs for which vLEIs have been issued for those LEIs with renewal dates of 30 days or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. How will/do you inform the Legal Entity of potential revocation of their vLEIs if their LEI lapses?			
4. Will/do you have a process to trigger the revocation of a Legal Entity vLEI?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Will/do you check your public Witnesses for vLEI credential issuance and revocation registry for erroneous or malicious issuances and revocations (primary issuances) in order to inform your management process that a key rotation/recovery may be required?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Will you notify GLEIF to revoke your Qualified vLEI Issuer vLEI Credential if you choose to no longer operate as a Qualified vLEI Issuer?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

> Required Documentation to be Submitted

H Website Requirements

Website Requirements

	Yes	No	Not Applicable
1. Will/do you display your vLEI Issuer Qualification TrustMark on your Qualified vLEI Issuer homepage?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Will/does your vLEI Issuer website display applications, contracts and required documents for Legal Entities to apply for vLEI Legal Entity Credentials and Role Credentials?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

> Required Documentation to be Submitted

I Software - Part A

Software

	Yes	No	Not Applicable
1. Will/do you have a standard IT service management process in place?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Will/do you have a document that describes the software development tools environment in place for vLEI operations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Will/do you have a formal process for installing, testing, and approving new software?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Will/do you have any outsourced software arrangements relating to vLEI operations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Will/do you have a process in place for identifying, tracking, and correcting software errors/bugs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

> Required Documentation to be Submitted

I Software - Part B

Software

	Yes	No	Not Applicable
6. Will/do your developers follow the security recommendations in the vLEI Ecosystem Governance Framework when designing software or services for the use with vLEI Credentials and the vLEI Ecosystem?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Will/do you use the KERIA and Signify/TS architecture or will/have implement(ed) a local KERI approach?	<input type="radio"/>		
8. Will/do you have a process in place to manage the security of created Autonomic Identifiers (AIDs)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Will the keys associated with the AIDs of Qualified vLEI Issuer Authorized Representatives (QARs) be rotated whenever there is a likelihood of key compromise?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Will the time and place of a key rotation be kept confidential among the QARs until after the rotation has been completed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. In the case of the key compromise, will key compromise recovery operations be reported to GLEIF within 24 hours of gaining knowledge of the key compromise?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Will all key compromise cases investigated as expeditiously as possible at your own expense to determine the source of the key compromise and a full report of the investigation will be made to GLEIF?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. For your QVI Delegated AIDs, will/do you use at least a threshold of 2 for your multi-signature group?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14. For your QVI witness services will/do you provide a Witness Pool or a Ledger Registrar?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15. If your answer to question 14 is a Witness Pool, will/does your KERI Witness Pool have a minimum pool of five (5) Witnesses?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. If your answer to question 14 is a Witness Pool, will/do you publish your Witnesses to at least one ecosystem discovery mechanism: a Well-Known URI IETF RFC-8615 on a web site(s) associated with your QVI entity, on web site(s) discoverable by search engines or Ledgers? For example, https://gleif-it.github.io/.well-known/keri/oobi/EDP1vHcw_wc4M__Fj53-cJaBnZZASd-aMTaSyWEQ-PC2/	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. If your answer to question 14 is a Ledger Registrar, what Distributed LedgerTechnology (DLT) are you using?	<input type="radio"/>		
18. Will/do you successfully install, test and implement vLEI software within the stated time frames and will/do you use vLEI software for hosting Witnesses and Watchers for Key Management?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

> Required Documentation to be Submitted

J Networks & Key Event Receipt Infrastructure (KERI)

Networks & Key Event Receipt Infrastructure (KERI)

	Yes	No	Not Applicable	Additional Documentation Requested
1. Please describe the current service/hosting environment. Is it hosted, in-house, via a third-party, etc.? Describe the use of any cloud-based resources such as Amazon Web Services or Microsoft Azure.				Relevant process documents and technical diagrams
2. Will/do you perform any monitoring over the vLEI Issuer-related IT infrastructure?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents
3. Are there any redundancies built into the hosting platform and hardware?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Copies of the related agreements
4. Has there been any unscheduled downtime of your own network or system in the past twelve (12) months?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents
5. Will/do you have a current disaster recovery and/or business continuity plan in place? How often is it tested? Has the continuity plan needed to be invoked during the past 3 operating years?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents
6. Will/do you have structured backup policies and practices?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents and technical diagrams
7. Will/are third party services (e.g., augmented staff, cloud services, data centers) utilized in order to provide Qualified vLEI Issuer services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents and technical diagrams
8. If your answer to question 7 is Yes, will/do you have a formal vetting process for evaluating the reliability of third-party service providers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents
9. If your answer to question 7 is Yes, will/does this process evaluate: Financial stability, Market reputation, Ability to meet vLEI Ecosystem Governance Framework requirements, Evaluating the potential risks of utilizing the services provided?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Relevant process documents and technical diagrams

> Required Documentation to be Submitted

K Information Security

Information Security

1. Have any IT operational or security audits (i.e., SSAE 16, SOC2, SAS70, ISO27001) been performed, and certification achieved for Qualified vLEI services, in the past?
2. Will/do you operate an information security policy or policies that meet the vLEI Ecosystem Stakeholder Security Policies requirements and which is/ are mandatory for all employees of the vLEI Ecosystem Stakeholder involved with vLEI transactions or vLEI data?
3. How will/do you ensure executive oversight and accountability for such policies, including formal governance and revision management?
4. How will/do you ensure vLEI Issuer systems personnel maintain an appropriate level of security awareness?
5. How will/do you protect physical access to critical company assets such as servers and data?
6. What internal security processes will/do you have in place for vLEI Issuer Operations personnel – criminal background checks, proof of identity validation, others?
7. How will/do you prevent unauthorized access to, or modification of, critical data assets?
8. How will/do you ensure unauthorized access to critical data assets can be detected and investigated?
9. How will/do you prevent unauthorized network intrusion?
10. Will/have you performed or engaged a third party to test system vulnerability, intrusion prevention and/or detection or perform penetration testing?
11. How will/do you ensure that, once vulnerabilities are discovered, these are remediated within appropriate time frames?
12. Will/do you have procedures in place to identify, document in an Incident Report and remediate any security breaches?

> Required Documentation to be Submitted

L Compliance

Legal Compliance

	Yes	No	Not Applicable
1. Will/have you execute(d) a vLEI Issuer Qualification Agreement with GLEIF?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Will/have you execute(d) a formal contract either physically or electronically with each Legal Entity for prior to the initial issuance of a Legal Entity vLEI?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Will/does your Legal Entity contract template include all required contract terms specified in Appendix 7 of the vLEI Issuer Qualification Agreement?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

General Compliance

	Yes	No	Not Applicable
1. Will you keep your vLEI Issuer Qualification up to date?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Will you confirm annually that you maintain a law abiding and ethical status in the business community as evidenced in the Annual vLEI Issuer Qualification?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Will/have you been accountable to other vLEI Ecosystem Stakeholders for conformance to the purpose, principles, and policies of the vLEI Ecosystem Governance Framework? Will/have you been responsible for and been able to demonstrate compliance with any other requirements of applicable law?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Will/have you informed GLEIF of updates to the vLEI Issuer Contact Details List (Appendix 4)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Will/have you informed GLEIF prior to or as soon as reasonably possible of any change of control at the Qualified vLEI Issuer, be it a change in ownership, voting power, or factual power of third party over the Qualified vLEI Issuer, is only one example of a change?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Will/have you used English as the primary language in your formal communications with GLEIF as a Qualified vLEI Issuer which includes all written, electronic, messaging, phone, conferences, communications?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Will/have you complied with the Intellectual Property and Confidentiality requirements in the Qualification Agreement?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Will/have you ensured that third parties comply with the vLEI Ecosystem Governance Framework when providing vLEI services to you as a Qualified vLEI Issuer?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. For third-party services, will/have you ensured that you remain fully and unrestrictedly responsible and liable to complying with, and acting in the spirit of, all the requirements for Qualification?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Will/do you ensure that the provisions of the vLEI Ecosystem Stakeholder Data Protection Policies are implemented and enforced?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Provide explanation:



Enabling global identity
Protecting digital trust

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[gleif.org](https://www.gleif.org)

Chair of the Board: Teresa Glasser
Chief Executive Officer: Alexandre Kech

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