



Crypto accounting policy template: the decisions your policy has to state

The crypto accounting policy is the document an auditor asks for first, and the one most entities do not have. This template walks through every decision a policy has to settle, written as fill-in positions rather than recommendations, so your finance team can adopt a position, document it, and apply it the same way every period.

CryptaCount

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What this document is for

A crypto accounting policy is a short, signed statement of how the entity accounts for digital assets: what is in scope, under which reporting framework, on what measurement basis, using which cost-basis method, priced from which source at which cut-off, and how fees, income and internal transfers are handled. It is not a technical paper on the standards. It is the internal rule book a preparer follows and a reviewer checks against.

The value of the policy is **consistency and documentation**, not cleverness. Two entities can adopt different defensible positions on the same question and both produce auditable books. What neither can do is decide the question afresh each quarter. Changing a method between periods is a change in accounting policy with its own disclosure and comparability consequences, and it is a classic audit finding when it happens by accident because nobody wrote the original position down.

If the policy is not written, dated and signed off, the entity does not have a policy. It has a habit.

The policy decisions, one by one

1. Scope: which assets the policy covers

State which holdings the policy applies to and which it deliberately excludes. Typical scoping lines separate fungible tokens held on public networks, stablecoins, tokens held as inventory or for trading, non-fungible tokens, staked or locked positions, and assets held on behalf of third parties. Anything held that the policy does not name is a gap the auditor will find.

2. Reporting framework

Name the framework the financial statements are prepared under: **IFRS** or **US GAAP**, and any local overlay. This choice is upstream of almost everything else in the policy, because measurement follows from it. See [IFRS crypto reporting](#) and [US GAAP crypto reporting](#) for the two positions, and the [IFRS vs US GAAP guide](#) for the comparison.

3. Measurement basis

Record the measurement basis that follows from the framework. Under IFRS, crypto is typically accounted for under **IAS 38** as an intangible asset, at cost less impairment, with revaluation available only in narrow circumstances. Under US GAAP, **FASB ASU 2023-08** requires in-scope crypto assets to be measured at fair value with changes recognised through net income. State the basis, state the assets it applies to, and confirm scope against the standards themselves.

4. Cost-basis method and consistency

Name the disposal cost-basis method the entity applies, whether it is applied per wallet or across the entity, and commit in writing to applying it consistently across all disposals and all periods. Add the escalation route for any proposed change: who approves it, how it is disclosed, and how comparatives are handled. CryptaCount supports 12 disposal cost-basis methods; see [cost basis methods](#).

5. Fair-value source and time convention

This is the single most commonly missing clause. State **which price source** is used (a named venue, an index or a hierarchy of fallbacks), **which cut-off** applies (for example a fixed time in a stated time zone at each period end), what happens when the primary source has no price for an asset, and how illiquid or thinly traded tokens are handled. A valuation nobody can reproduce is a valuation nobody can audit.

6. Acquisition and disposal fees

State whether fees paid to acquire an asset are capitalised into its cost basis and whether fees paid to dispose reduce net proceeds, and name the accounts used. Fees are small individually and material in aggregate over a high-volume period, and inconsistent handling shows up directly in realised gains.

7. Network and gas fees

Set the position on network fees: when they are capitalised into the cost of an acquired asset, when they are expensed, and how fees on internal transfers are treated. Note explicitly that because gas is

usually paid in the native token, settling a fee can itself be a small disposal of that token that has to be measured and posted.

8. Income received in crypto

Cover staking rewards, mining proceeds, airdrops, and tokens received as payment for goods, services or salary. State the measurement point (value on receipt), the income account credited, and the rule that the receipt value becomes the asset's cost basis so the same value is not recognised twice on a later disposal.

9. Transfers between the entity's own wallets

State plainly that a movement between wallets or accounts the entity controls is **not a disposal**. Carrying amount travels with the asset and no gain or loss arises. Record how own-wallet movements are identified and evidenced, because this is where crypto books most often go wrong: booked as a sale, an internal transfer invents a realised gain that never happened.

10. Custody and wallet inventory

Maintain a register of every wallet address, exchange account and custodian in scope, with the entity that controls it, the purpose, the signatories or key holders, and the evidence of control. Say who owns the register, how a new wallet is added, and how a decommissioned one is closed off. Completeness of the books cannot be asserted without completeness of this list.

11. Review cadence and sign-off

Set a review cadence (at least annually, and on any material change in holdings, venues or standards), name the owner, and require the policy to be **signed and dated**. Keep superseded versions: the auditor will want to know which version was in force in the period under review.

Policy decision table

Copy this table into your policy document and complete the right-hand column. The middle column states what the decision is; it does not state our recommendation.

Decision	What has to be settled	Entity's position
Scope	Which assets and holdings the policy covers, and which are excluded.	
Reporting framework	IFRS, US GAAP, or a local framework, plus any parent reporting overlay.	

Measurement basis	The basis that follows from the framework, and the assets it applies to.	
Cost-basis method	The disposal method chosen, and whether it is applied per wallet or entity-wide.	
Consistency	Commitment to apply the method across all periods, and the approval route for change.	
Fair-value source	Named price source or hierarchy, and the fallback when no price exists.	
Valuation cut-off	The time and time zone used at each period end.	
Acquisition fees	Capitalised into basis or expensed, and the accounts used.	
Disposal fees	Deducted from proceeds or expensed, and the accounts used.	
Network / gas fees	When capitalised, when expensed, and how the native-token disposal is measured.	
Income in crypto	Measurement point, income account, and basis carried forward.	
Internal transfers	Confirmation that own-wallet movements are not disposals, and how they are evidenced.	
Custody register	Who maintains the wallet and account inventory, and how control is evidenced.	
Sub-ledger to GL	How sub-ledger detail is summarised and posted, and how it is reconciled.	
Review and sign-off	Cadence, owner, approver, date, and version control.	

Making the policy operational

A policy only holds if the system that produces the numbers enforces it. CryptaCount is the [crypto sub-ledger](#) that applies one cost-basis method deterministically across every disposal, carries basis through internal transfers, folds fees into the correct side of each calculation, and posts summarised period entries to the general ledger with the transaction-level detail retained underneath. That is what turns a written position into a reproducible set of books.

Pair this template with the [crypto audit readiness checklist](#) and the [journal entries cheat sheet](#) before your next close.

Disclaimer. General information, not legal, accounting or tax advice. Confirm scope, measurement and presentation against the applicable standards and with a qualified advisor.



Put your crypto books on a real sub-ledger at app.cryptacount.com

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