

# Contract Level Compliance

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### **Abstract**

Contract Level Compliance (CLC) is a framework for implementing regulatory compliance in smart contracts. Built to address the inevitable demand for identification of onchain actors in accordance with global regulations, CLC enables protocols to securely, privately, and efficiently verify a user's compliant status before executing restricted logic on their behalf.

By integrating the Everest identity oracle [27], Chainlink Automation [26], and Concerro V2 [17], Contract Level Compliance ensures that protocols across chains can confidently execute regulatory-compliant smart contracts, while preserving maximum decentralization.

This new generation of regulatory-compliant smart contracts will enable the creation of public chain applications that any onchain actor *and* traditional institution can use, marking an industry first in the combination of both markets.

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## 1 Introduction

The era of blockchain and DeFi as entirely unregulated global markets is gradually, but firmly, coming to an end. Regulators across the world have already begun introducing guidelines and enforcement measures for protocols and service providers in the industry [2]. The EU’s MiCA regulation is law [23] and the US president signed an executive order to provide regulatory clarity for blockchain and digital assets [16].

In the real world, people are required to disclose certain information about themselves to be able to use traditional financial services [28] and engage in other regulated activities, such as buying and selling property. Centralized exchanges are already required to collect KYC data on their customers [19]. Onchain protocols will be no different—onchain actors will require identification [21].

Regulators will not accept KYC data from just anyone. They require the entity facilitating the KYC to enact certain measures, including, but not limited to, ongoing monitoring and risk rating [1] — tasks beyond the scope of most smart contract projects.

As smart contracts and blockchains are built upon the foundational idea of decentralization [3], this poses a unique challenge. Regulatory compliance relies on centralized oversight and trusted intermediaries, whereas on-chain protocols function autonomously, without a governing authority to enforce identity verification or risk assessments. This structural incompatibility makes it difficult to implement compliance without introducing centralisation risks or compromising the permissionless nature of blockchain networks.

Contract Level Compliance addresses this challenge by enabling protocols to enforce regulatory compliance directly within smart contracts, using Chainlink, the industry standard for offchain computation [24], and Everest, a licensed data provider to the Chainlink network [15].

## 2 Architectural Overview

The core functional objective of Contract Level Compliance is to make executing compliant smart contracts as simple as possible. To achieve this, CLC is built upon four core principles that guide its design and operation:

- **Security** – The system must function securely to ensure smart contracts behave as intended (see Section 3).

- **Decentralization** - The Chainlink network must be used for offchain communication (requests for identity data) and computation (automated response handling) because it provides the most secure way of performing these activities without compromising decentralization [24].
- **Privacy Protection** - No personal user information should be revealed onchain; only a “yes” or “no” response to the question “Has this address completed KYC with a regulated entity?” is provided.
- **Legal Compliance** - Identity data must be Sybil-resistant to ensure it cannot be transferred in blockchain environments, preventing money laundering and identity fraud. Additionally, the data must be issued by a licensed and regulated entity to maintain compliance [1].

To achieve these design principles, the system relies on three key integrations that form the foundation upon which the *Router* and *Logic* contracts operate.

## 2.1 Integrations

Everest, Chainlink, and Concerro each play an important role in ensuring that Contract Level Compliance functions efficiently across chains. Everest provides Sybil-resistant identity verification [15], Chainlink facilitates secure offchain computation [24], and Concerro enables fast, cost-effective crosschain messaging [17].

### 2.1.1 Everest

Everest is a regulated provider of Sybil-resistant identity data to smart contracts. It solves the deduplicated identity problem by using biometric data as a private key, locking each identity to a verifiably unique human, preventing transferability and therefore Sybil attacks. As a licensed entity, Everest satisfies regulatory demands for facilitating KYC [29], which is crucial for legal compliance.

Users voluntarily submit KYC information through Everest’s platform and retain ownership of their data.

### **2.1.2 Chainlink**

Chainlink is the industry standard for offchain communication and computation for smart contracts. Chainlink has proven itself as a secure standard for offchain computation, securing most of the DeFi industry since its inception and servicing traditional institutions [24].

### **2.1.3 Concerro**

Concerro’s Lanca bridging protocol improves upon Chainlink CCIP [5] by reducing fees and crosschain transaction times, while maintaining the security of CCIP as a settlement layer. Concerro achieves this with crosschain pools and its own crosschain messaging layer (built with Chainlink Functions [6] and Symbiotic [25]) for transaction execution [17].

## **2.2 Router**

The CLC Router contract will be deployed on every Concerro Compatible Chain (CCC) by the Contract Level team. This contract will be used to make requests for the compliance status of an onchain actor, and then, if the actor is compliant, route the response to the appropriate implementation of the Logic contract.

### **2.2.1 Requests**

Requests are made to the Everest Chainlink node [27] for a boolean indicating whether an onchain address has been linked to the deduplicated identity of a person who has completed KYC.

Requests must contain the address of the onchain actor whose KYC status is being queried and the address of the custom Logic implementation contract for callback.

Requests can be made by EOAs or smart contracts.

A fee is taken for each request (see Section 4).

### **2.2.2 Automation**

The Everest Chainlink Consumer contract emits a Fulfilled event when requests are fulfilled. Chainlink’s offchain Automation nodes continuously monitor for this event [7]. If an emitted event matches a pending request in the Router’s state, the Chainlink Automation Forwarder calls the Router contract with the fulfilled response, which is then routed to the appropriate Logic implementation if the requested address is compliant.

### 2.2.3 IERC677Receiver

The Router implements the ERC677 Receiver interface to enable requests in a single transaction using the LINK token’s `transferAndCall()` functionality [12].

### 2.2.4 Upgradeability

The Router implements the TransparentUpgradeableProxy [20] to store Chainlink Automation variables such as the Forwarder address and Upkeep ID as immutable. This will save on gas from SLOADs [9].

## 2.3 Logic

The CLC Logic contract is abstract and must be inherited to implement Contract Level Compliance. Custom implementations of the CLC Logic contract can be made by anyone.

Logic contracts include an internal function that must be overridden, where the code for a regulated activity or otherwise handling of a compliant-verified address may be defined. This internal function is called by an external function that can only be called by the Router. When a request is fulfilled and the onchain actor is compliant, this function is passed the requested address.

### 2.3.1 IERC165

Logic contracts implement the ERC165 standard interface [13], allowing the Router to check that the Logic address to call does indeed implement the expected Logic interface.

## 2.4 Calltrace

Requests for the compliant status of onchain actors and an automated callback passing the fulfilled response to a custom logic contract are the intended functionality for external use, and can be executed in a single transaction.

The CLC Router interacts with a few external services from the Internet of Contracts [4] (as well as the CLC Logic contract).

1. **LINK Token** – LINK is used to request the compliant status of an onchain actor. `transferAndCall()` can be used for single-transaction requests, or requests can be made directly from the Router after approving the token.

2. **Router** – The Router updates its state and forwards the request to the Everest Consumer.
3. **Everest Consumer** – The Everest Chainlink Consumer makes a request to the Everest Chainlink node.
4. **Everest Chainlink Node** – The Everest Chainlink node fulfills the request and sends the response back to the Everest Consumer.
5. **Chainlink Automation** – Chainlink offchain Automation nodes monitor the Everest Consumer for fulfilled request events. If a pending request exists, the Chainlink Automation Forwarder calls `performUpkeep()` on the Router.
6. **Router** – The Router updates its state and forwards the fulfilled response to the appropriate Logic contract.
7. **Logic** – If the onchain actor has completed KYC, the restricted logic executes on their behalf.

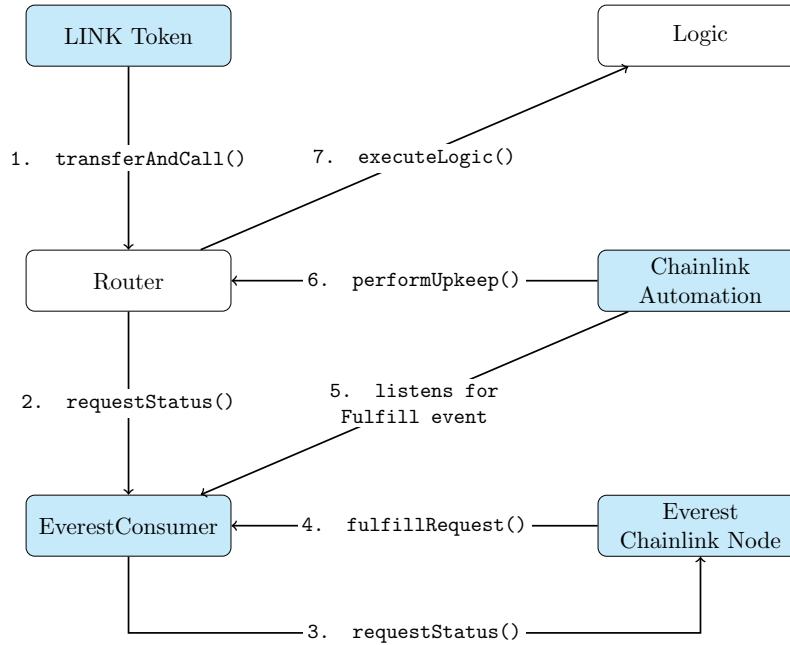


Figure 1: Single-Chain Calltrace

## 2.5 Crosschain Interoperability

The Everest Chainlink node only needs to provide identity data to a single Concero Compatible Chain (CCC) for Contract Level Compliance to be available on every CCC.

A “Parent” Router will be deployed on the chain where the Everest identity data is available, and any requests made on other chains will be made to a “Child” Router on that chain. The Child Router will interact with the Concero infrastructure to route the request (and fee in LINK) to the Parent Router, which will route the fulfilled response back to the appropriate Child and Logic implementation.

### 2.5.1 Crosschain Calltrace

The transaction flow for a crosschain request and logic callback introduces additional steps of sending and receiving messages between “Child” and “Parent” Routers, through the Concero infrastructure.

LINK will need to be sent from the Child chain to the Parent chain in order to pay for the Automation and Node request services. Alternatively, a payment system allowing users to initiate requests in other tokens that get swapped to LINK on the parent chain could be used.

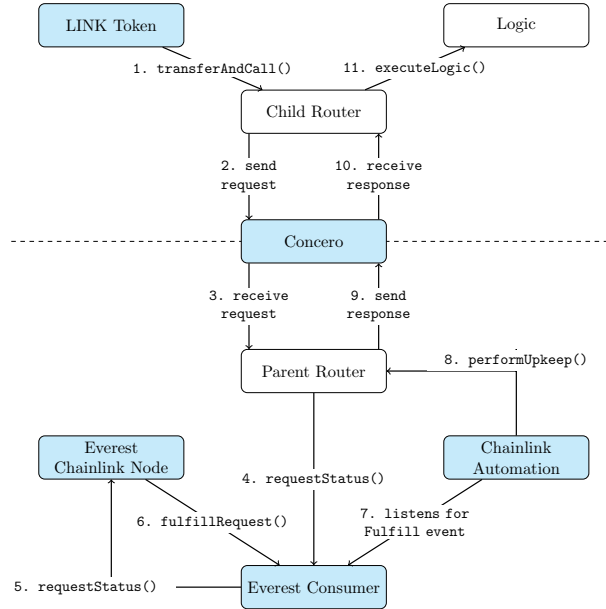


Figure 2: Crosschain Calltrace



## 3 Security

The highest priority for Contract Level Compliance is, and always will be, security. Smart contracts must behave as intended and never behave in any way that is not intended. This is critical because CLC manages sensitive compliance and identity data onchain, where a vulnerability could falsify a user’s compliance status or disrupt the system. The following measures uphold this priority, detailing the rigorous processes that secure CLC’s operation.

### 3.1 Testing

All Contract Level smart contracts undergo a comprehensive testing process to ensure their security and reliability. This includes:

- **Unit Tests:** Ensure 100% code coverage, using realistic scenarios like forked mainnets and randomized inputs.
- **Integration Tests:** Verify interactions between contracts, external dependencies, and deployment processes.
- **Static Analysis:** Detect vulnerabilities and logical errors without executing the code.
- **Invariant Tests:** Confirm that key properties—such as restricted logic only executing for KYC-verified actors—always hold true.
- **Formal Verification:** Mathematically prove contract correctness under all conditions using advanced tools.
- **Mutation Tests:** Introduce artificial bugs to strengthen test suites and specifications.
- **Test Networks:** Deploy and evaluate behavior in real-world conditions.

Invariants are particularly important [10], as they define the system’s unbreakable rules. For CLC, the foundational invariant is that restricted logic must only execute for actors who have completed KYC with Everest. Formal verification provides mathematical proof that these invariants are always maintained, offering the highest level of assurance.

### **3.2 Audits and Bug Bounty**

Before deploying to production, CLC must undergo multiple independent security reviews from reputable firms, followed by competitive audits that engage the wider security community. These processes ensure that the contracts are thoroughly vetted for vulnerabilities and correctness. It is unacceptable to deploy unaudited smart contracts, as vulnerabilities are far more likely without these checks [18].

Post-deployment, a bug bounty program must be established to incentivize ethical hackers to continuously test the system’s security [11]. This crowdsourced approach helps identify and fix any overlooked vulnerabilities before they can be exploited, providing an ongoing layer of defense.

### **3.3 Gas Limit**

Gas limits [14] are enforced on callbacks to prevent gasbombing or denial-of-service attacks, with configurable limits within defined bounds.

### **3.4 Multisig**

A Safe [22] multisig wallet manages administrative functions like upgrades and fee withdrawals, preventing a single point of failure.

## **4 Fees**

Each request takes a fee, covering the costs of external services provided by Everest, Chainlink, and Concero, as well as the Contract Level protocol itself.

Fees are paid in LINK. Payment abstraction allowing requests to be paid in native or alternative tokens could be introduced in a later iteration.

Fee Type	Purpose	Applies To
Everest Fee	Covers the cost of requesting KYC status from the Everest Chainlink node.	All requests
Chainlink Automation Fee	Covers the minimum balance required for the associated Chainlink Automation upkeep to perform.	All requests
Concero Fee	Covers the cost of crosschain interactions facilitated by the Concero infrastructure.	Crosschain requests only
Contract Level Fee	Covers the costs of ongoing development and maintenance of the Contract Level ecosystem.	All requests

Table 1: Fee Structure

## 5 Future Developments

Once everything that has been laid out so far in this paper has been achieved, there will be ongoing developments to the Contract Level ecosystem.

### 5.1 Compliant Use Cases

The Contract Level *Compliance* infrastructure has been built from the ground up with modularity and use case in mind. The Contract Level team will build new smart contracts on top of the CLC system. The exact use cases, and in which order they are built, are yet to be determined, but could include compliant insurance contracts, compliant derivatives contracts or compliant “wrappers” for, or forks of, popular smart contract protocols.

### 5.2 Native Token

There are currently no plans to deploy a native Contract Level token, and its specifics are yet to be determined. However, such a token would follow the ERC677 [12] and CCT [8] standards, with a fixed max supply across chains. The purpose of the token *could* be Contract Level revenue distribution.

## 6 Conclusion

We have proposed Contract Level Compliance, a framework for implementing regulatory compliance directly in smart contracts. We have outlined its architecture and what is required for it to be securely launched. The architecture has been designed to be as simple, modular, and efficient as possible. The launch requirements prioritize security through comprehensive testing, audits, and adherence to best practices, ensuring the system functions as intended.

With this foundation, its modular design supports a broad spectrum of compliant use cases across chains, meeting regulatory requirements while enabling practical and flexible integrations. Guided by security, decentralization, privacy protection, and legal compliance, CLC offers a viable path for onchain protocols to meet global legal standards without sacrificing the fundamental strengths of blockchain.

## References

- [1] Financial Conduct Authority. Money laundering regulations. <https://www.fca.org.uk/firms/financial-crime/money-laundering-regulations>, 2023. Archived: <https://archive.is/zNzPj>.
- [2] Financial Stability Board. Fsb global regulatory framework for crypto-asset activities. <https://www.fsb.org/2023/07/fsb-global-regulatory-framework-for-crypto-asset-activities>, 2023. Archived: <https://archive.is/adMl9>.
- [3] Vitalik Buterin and Satoshi Nakamoto. Ethereum whitepaper and bitcoin whitepaper. [https://ethereum.org/content/whitepaper/whitepaper-pdf/Ethereum\\_Whitepaper\\_-\\_Buterin\\_2014.pdf](https://ethereum.org/content/whitepaper/whitepaper-pdf/Ethereum_Whitepaper_-_Buterin_2014.pdf), <https://bitcoin.org/bitcoin.pdf>, 2014 and 2008. Archived: <https://archive.is/WwlRE>, <https://archive.is/6JmLT>.
- [4] Chainlink. From tcp/ip to ccip: The internet of contracts. <https://blog.chain.link/from-tcpip-to-ccip/>, 2023. Archived: <https://archive.is/kE7iC>.
- [5] Chainlink. Chainlink ccip documentation. <https://docs.chain.link/ccip/>, 2025. Archived: <https://archive.is/AzZ4h>.
- [6] Chainlink. Chainlink functions. <https://docs.chain.link/chainlink-functions>, 2025. Archived: <https://archive.is/yk7RS>.

- [7] Chainlink. Chainlink log trigger automation. <https://docs.chain.link/chainlink-automation/guides/log-trigger>, 2025. Archived: <https://archive.is/toMpF>.
- [8] Chainlink. Cross-chain tokens. <https://docs.chain.link/ccip/concepts/cross-chain-tokens>, 2025. Archived: <https://archive.is/kDlPw>.
- [9] EVM Codes. Sload opcode. <https://www.evm.codes/?fork=cancun#54>, 2025. Archived: <https://archive.is/xRNYW#54>.
- [10] Dacian. Find highs before external auditors using invariant fuzz testing. <https://dacian.me/find-highs-before-external-auditors-using-invariant-fuzz-testing#heading-thinking-in-invariants>, 2024. Archived: <https://archive.is/hN5RN>.
- [11] C. Zhong E. Marcavage, J. Mason. Predicting the effectiveness of blockchain bug bounty programs. [https://www.researchgate.net/publication/370621884\\_Predicting\\_the\\_Effectiveness\\_of\\_Blockchain\\_Bug\\_Bounty\\_Programs](https://www.researchgate.net/publication/370621884_Predicting_the_Effectiveness_of_Blockchain_Bug_Bounty_Programs), 2023. Archived: <https://archive.is/J8crf>.
- [12] Ethereum EIP. Erc677 standard with transferandcall(). <https://github.com/ethereum/EIPs/issues/677>, 2017. Archived: <https://archive.is/zNzPj>.
- [13] Ethereum EIP. Erc165 standard interface detection. <https://eips.ethereum.org/EIPS/eip-165>, 2018. Archived: <https://archive.is/likUq>.
- [14] Ethereum. Gas and gas limits. <https://ethereum.org/en/developers/docs/gas/#what-is-gas-limit>, 2025. Archived: <https://archive.is/uj1Z7>.
- [15] Everest. Everest is now a data provider on the chainlink network, bringing novel identity data to smart contracts. <https://everestdotorg.medium.com/everest-is-now-a-data-provider-on-the-chainlink-network-bringing-novel-identity-data-to-377039492189>, 2022. Archived: <https://archive.is/U0IvS>.
- [16] The White House. Strengthening american leadership in digital financial technology. <https://www.whitehouse.gov/presidential-actions/2025/01/strengthening-american-leadership-in-digital-financial-technology>, 2025. Archived: <https://archive.is/P4IBw>.

- [17] O. Kron. Concero v2 technical overview. <https://blog.okron.cc/posts/concero-v2-technical-overview>, 2024. Archived: <https://archive.is/zrFmC>.
- [18] Rekt News. Leaderboard. <https://rekt.news/leaderboard/>, 2025. Archived: <https://archive.is/Dq1u6>.
- [19] Notabene. Crypto travel rule 101: Kyc in crypto. <https://notabene.id/crypto-travel-rule-101/kyc-crypto>, 2023. Archived: <https://archive.is/lthgR>.
- [20] OpenZeppelin. Transparent upgradeable proxy. <https://docs.openzeppelin.com/contracts/4.x/api/proxy#TransparentUpgradeableProxy>, 2025. Archived: <https://archive.is/PBoIA>.
- [21] Federal Register, Forbes, and Blockworks. Onchain identification requirements. <https://public-inspection.federalregister.gov/2024-30496.pdf>, <https://www.forbes.com/sites/shehanchandrasedkera/2024/12/27/understanding-the-new-irs-defi-broker-tax-regulations>, <https://blockworks.co/news/bipartisan-bill-defi-project-controllers>, 2024 and 2023. Archived: <https://archive.is/dHYf7>, <https://archive.is/BGS6S>, <https://archive.is/F8uKU>.
- [22] Safe. Safe documentation. <https://docs.safe.global/home/what-is-safe>, 2025. Archived: <https://archive.is/18Zbi>.
- [23] European Securities and Markets Authority. Markets in crypto-assets regulation (mica). <https://www.esma.europa.eu/esmas-activities/digital-finance-and-innovation/markets-crypto-assets-regulation-mica>, 2023. Archived: <https://archive.is/WzZAD>.
- [24] Swift. Swift, ubs asset management, and chainlink successfully complete innovative pilot to bridge tokenized assets with existing payment systems. <https://www.swift.com/news-events/press-releases/swift-ubs-asset-management-and-chainlink-successfully-complete-innovative-pilot-bridge-tokenized-assets-existing-payment-systems>, 2023. Archived: <https://archive.is/EVAtu>.
- [25] Symbiotic. Symbiotic documentation. <https://docs.symbiotic.fi/>, 2025. Archived: <https://archive.is/2HK13>.

- [26] Chainlink Team. Chainlink automation. <https://docs.chain.link/chainlink-automation>, 2023. Archived: <https://archive.is/w5nJY>.
- [27] Everest Team. Everest identity oracle. <https://developer.everest.org/#everest-identity-oracle>, 2023. Archived: <https://archive.is/F17Ye#everest-identity-oracle>.
- [28] Trulioo. Crypto identity verification and kyc. <https://www.trulioo.com/industries/crypto-identity-verification/kyc>, 2023. Archived: <https://archive.is/x0YSh>.
- [29] Business Wire. Everest secures vfa license to provide regulated defi globally. <https://www.businesswire.com/news/home/20210603005776/en/Everest-Secures-VFA-License-to-Provide-Regulated-DeFi-Globally>, 2021. Archived: <https://archive.is/mRQKfj>.