COMMERCIAL PROPOSAL · EASTERN CARIBBEAN AND CREDIT UNIONS

PSP in a box for the new ECCU licences — and a digital layer for credit unions

Accounts, wallets and a double-entry ledger, daily e-float reconciliation, AML, customer apps and a back office — delivered with a local integrator, hosted where the ECCB approves.

For: **New PSP licensees under the ECCU Payment System and Services Acts, regional integrators and credit-union leagues**

Date: **22.11.2026** Indicative — not an offer to contract

03.2025
ECCB publishes the model Payment System and Services Bill[1]

02.2026 · 21.04.2026 · 18.09.2026
Act passed in Dominica, Montserrat (Act No. 4/2026) and St Kitts and Nevis[2][3][4]

12 months
transition period for existing providers under the Act[3]

12.06.2026
Barbados BiMPay instant payments live, mandatory for banks and credit unions[6]

01 Your situation

The ECCB's model Payment System and Services Bill (03.2025) is becoming law across the currency union: passed in **Dominica (02.2026)**, **Montserrat (Act No. 4/2026, 21.04.2026)** and **St Kitts and Nevis (18.09.2026)**; Grenada's bill has been tabled[1][2][3][4]. Licence classes cover EFT and settlement, electronic money, system operators and others; capital is set by the ECCB in licence conditions; licences run for one year with renewal[1][3].

E-float must sit on a separate account at the ECCB or a bank, and the licensee must be able to show **evidence of the e-float**. Outsourcing material functions needs the ECCB's **written approval (s.36)**; there is a sandbox (s.29) and a 12-month transition; banks and credit unions are exempt (s.27)[3]. The ECCB suspended DCash 2.0 on 13.02.2026 to prioritise a regional Fast Payment System[5].

Credit unions are the other buyer: **220 credit unions, 2.9m members, $10.7bn in assets** (WOCCU 2024)[7]; in Barbados, participation in **BiMPay** is mandatory for banks and credit unions since its launch on **12.06.2026**[6].

Where it hurts

- A new PSP needs a complete, supervisable stack — ledger, wallets, e-float evidence, AML — before it can launch, on a small-market budget.
- Outsourcing needs ECCB written approval, so the vendor and hosting must be explainable to the regulator from the start.
- Correspondent de-risking cut 40%+ of relationships in 2011–2020; every PSP has to prove strong controls[8].
- Credit unions must join instant-payment systems with legacy cores.

02 What we deliver, requirement by requirement

This is a partner-led offer: we provide the platform, a local integrator delivers and supports. Instant-payment connectors are on the roadmap and would be built with that integrator.

REQUIREMENT	HOW WE MEET IT	STATUS
Accounts, e-money wallets and payments	Account core with customers, products, payments and cards; double-entry ledger underneath. Account core and channels, Double-entry ledger	Available
E-float on a separate account; evidence of e-float[3]	Daily reconciliation of e-money outstanding (ledger) vs. float account statements; history kept as evidence. Bank statement ingest, Daily safeguarding reconciliation	Available

REQUIREMENT	HOW WE MEET IT	STATUS
Evidence for the regulator	Sealed WORM audit with Merkle proofs; four-eyes approvals; GL and end-of-day reports. Immutable audit trail (WORM + Merkle), Back office with four-eyes, GL, trial balance and end-of-day	Available
AML and sanctions controls	Monitoring rules, scoring, case management, OFAC screening; further lists in the pilot. Transaction monitoring and sanctions screening, Further sanctions lists	Pilot by Q1 2027
Customer channels	White-label customer web app (English UI available) and a Flutter mobile app, branded per licensee. Account core and channels	Available
Outsourcing approval by the ECCB (s.36)[3]	Single-tenant deployment wherever the ECCB approves; documentation pack for the approval request. Deploy anywhere, Vendor due-diligence pack	Roadmap by Q1 2027
Regional Fast Payment System / BiMPay connectivity[5][6]	Connector built with a local integrator on our ISO 20022 components. ISO 20022 messaging, Regional instant-payments connector	Roadmap by Q4 2027

03 Deployment and data residency

Hosting is agreed with the ECCB as part of the outsourcing approval (s.36)[3].

Single-tenant, location approved by the ECCB

Available

Deployed from our Kubernetes manifests into the cloud region or data centre the regulator accepts.

Shared platform via an integrator

Available

Several small PSPs on one installation with schema-per-tenant isolation, run by a regional partner.

Sandbox first

Available

Start under the ECCB sandbox (s.29) with simulators, then connect real banks.

04 Security and compliance posture

We say exactly where we are. No certificates are claimed below that we do not hold.

Controls built into the platform

- Ledger entries immutable at database level; unbalanced transactions rejected at commit; idempotency key on every posting.
- Append-only audit sealed into S3 Object Lock (COMPLIANCE mode) with Merkle roots; tamper detection and per-record proofs.
- Role-based access and four-eyes approvals in the back office.
- Sanctions screening (OFAC SDN) and rule-based transaction monitoring.
- Tenant isolation by PostgreSQL schema, or a dedicated installation in your own cloud account.

Not yet in place (with plan)

- No certifications yet. ISO 27001: in progress/planned. SOC 2 Type I: planned.
- The platform is at proof-of-concept stage and runs against simulators of external systems; the pilot is where your real statements and rails are connected.
- Independent penetration test: planned before any production go-live.
- Vendor due-diligence pack (contract template, exit plan, BCP/DR): in preparation, target Q1 2027.
- No production customers or references yet — the pilot is priced to reflect that.
- No regional partner signed yet; the offer is delivered through a local integrator or credit-union league once one is in place.

05 Pilot offer

Sandbox pilot with a licensee or league and its integrator.

Scope

- Platform installed for one PSP or credit union in the sandbox.
- E-float reconciliation on real statements from the float account.
- Back-office, AML and audit set-up; customer app branded.

Success criteria

- Daily e-float evidence produced for the full pilot.
- Documentation accepted for the ECCB outsourcing approval request.

Plan · 6–10 weeks

Weeks 1–2 Discovery and data mapping: your accounts, statements, ledger extracts and reporting calendar.

Weeks 3–6 Configuration in a sandbox in the region you choose; your historical statements and balances loaded and reconciled.

Weeks 7–10 Parallel run next to your current process; break review with your team; report pack and go/no-go.

Price

$30–150k implementation (credit-union scale)
$1–5k / month subscription

Indicative ranges from our market assessment; the final price depends on scope, volumes and hosting.

06 Why us

Complete stack, small footprint

Core, ledger, reconciliation, AML, apps and back office in one deployable product sized for small markets.

One engine, not three tools

Ledger, reconciliation and immutable audit share one double-entry core, so every reconciled number traces back to postings and every decision to a sealed audit record.

Evidence a regulator can verify

Audit segments are WORM-locked and Merkle-sealed; an auditor can check any exported record against the archive without trusting us.

Sits next to your core

The safeguarding and digital-asset modules depend only on statements, ledger extracts and ports, not on replacing your system.

Open formats

ISO 20022 (pacs/camt) and MT940 in, readable reports out; no proprietary lock-in.

Modern, small footprint

Go services on PostgreSQL, NATS JetStream, Valkey and S3; containers and Kubernetes; multi-tenant SaaS or single-tenant in your region.

Compared with Smart Solution, ERI Olympic, Profile Finuevo, Mbanq and Finastra: established core vendors serve credit unions and banks today[9]. We bring e-float evidence and a tamper-evident audit trail built in, and a partner-led model priced for new PSP licensees.

07 Next steps

1. Introductory call with the licensee, league or integrator.
2. Demo of the PSP stack on simulators.
3. Sandbox pilot plan and ECCB outsourcing documentation.

kir.repnikov@reinvent.team https://neobank.reinvent.team

Status legend

- **Available** — exists in our codebase today and can be demonstrated live (the platform is at proof-of-concept stage, see Security).
- **Pilot** — in active development; delivered and configured for you inside the pilot, by the quarter shown.

- **Roadmap** — planned, not built yet; target quarter shown. We will not charge for roadmap items before they exist.

Regulatory references

Dates and figures are as published by the sources below, checked on 21–22.11.2026. This proposal is not legal advice; confirm requirements with your compliance adviser.

1. ECCB, Payment System and Services Bill published (03.2025) — https://www.eccb-centralbank.org/news/the-eastern-caribbean-central-bank-publishes-the-new-payment-system-and-services-bill-on-its-website
2. Government of Dominica, Parliament passes Payment System and Services Act 2026 — https://pressroomopm.gov.dm/parliament-passes-payment-system-and-services-act-2026-to-modernise-digital-payments-framework/
3. Montserrat, Payment System and Services Act, Act No. 4 of 2026 — https://www.gov.ms/wp-content/uploads/2026/05/Act-No-4-of-2026-Payment-System-and-Services-Act.pdf
4. St Kitts and Nevis, Payment Systems and Services Bill 2026 passed (18.09.2026) — https://skncgtoronto.gov.kn/2026/09/18/payment-systems-and-services-bill-2026-passed-in-national-assembly/
5. ECCB suspends DCash 2.0 to prioritise regional Fast Payment System — https://discovermni.com/2026/02/16/eccb-suspends-dcash-2-0-to-prioritise-regional-fast-payment-system/
6. Central Bank of Barbados, mandatory participation in BiMPay — https://www.centralbank.org.bb/news/bimpay-news/mandatory-participation-in-national-instant-payment-system
7. WOCCU, 2024 Statistical Report; CariCCU consolidated statistics — https://www.woccu.org/documents/2024_Statistical_Report_EN
8. IDB, Caribbean Dev Trends — correspondent banking de-risking — https://blogs.iadb.org/caribbean-dev-trends/en/8408
9. IBS Intelligence, SJCCU adopts Finuevo core; The Paypers, Mbanq for Haitian credit unions — https://ibsintelligence.com/ibsi-news/sjccu-adopts-finuevo-core-to-modernise-banking-operations/

Reinvent Team · kir.repnikov@reinvent.team · neobank.reinvent.team