COMMERCIAL PROPOSAL · EU AND UK E-MONEY AND PAYMENT INSTITUTIONS

Safeguarding, reconciliation and evidence — one module for EU and UK licensees

Daily safeguarding reconciliation from bank statements, shortfall handling, monthly return drafts and a tamper-evident audit trail, sold next to your current core.

For: **E-money and payment institutions in the EU/EEA and the UK (general version — use a country version where one exists)**

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

07.05.2026 UK: CASS 15 safeguarding in force[1]	**09.04.2027** EU: Instant Payments Regulation deadline for EMIs and PIs[2]	**~27 months** EU: PSD3/PSR re-authorisation of EMIs as PIs after entry into force[3]	**Annually** EU: DORA register of information; ICT providers need an LEI[4]

01 Your situation

Regulators on both sides of the Channel converge on the same expectations: client funds on segregated accounts, daily reconciliation, reporting of shortfalls and independent audit. In the UK, CASS 15 has applied since **07.05.2026**, with daily reconciliations, a monthly return and an annual audit[1]. In the EU, the Instant Payments Regulation sets **09.04.2027** for EMIs and PIs[2], and PSD3/PSR will require existing EMIs to be re-authorised within about 27 months of entry into force[3].

DORA adds vendor obligations: an annual register of ICT providers, each identified by an LEI, and contracts meeting Art. 30[4].

Where it hurts

- Daily reconciliations rebuilt by hand from bank portals and core exports.
- Shortfall escalation and auditor evidence scattered across e-mail and spreadsheets.
- Large reconciliation suites are priced for larger firms; small and mid-sized licensees are under-served (our assessment).
- Vendor due diligence: ownership, subcontractors, EU data, exit plan.

02 What we deliver, requirement by requirement

REQUIREMENT	HOW WE MEET IT	STATUS
Daily safeguarding reconciliation	Requirement (your ledger) vs. resource (statements, insurance cover, segregated assets) every business day; shortfall/excess breaks with escalation. Daily safeguarding reconciliation	Available
Statements of safeguarding accounts	camt.053 / camt.054 / MT940 ingest with continuity and consistency checks. Bank statement ingest	Available
Monthly return drafts (CASS 15, EU national rules)	Drafted from the month's reconciliations under the UK or EU rule pack. Regulatory return draft and rule packs, EU EMD/PSD2 safeguarding pack	Pilot by Q1 2027
Audit and supervisory evidence	WORM archive (S3 Object Lock) with Merkle proofs per record. Immutable audit trail (WORM + Merkle)	Available
Books of relevant funds	Double-entry ledger with balanced, immutable, idempotent postings, if you want us to hold the books too. Double-entry ledger	Available

REQUIREMENT	HOW WE MEET IT	STATUS
Instant payments and VoP (EU)[2]	ISO 20022 messages today; SCT Inst and VoP handling planned. ISO 20022 messaging, SEPA scheme pack, Verification of Payee	Roadmap by Q1 2027
DORA Art. 30 contract and exit plan[4]	Contract template, exit plan, BCP/DR description and LEI. Vendor due-diligence pack	Roadmap by Q1 2027

03 Deployment and data residency

Hosted SaaS, EU or UK region

Pilot by Q1 2027

Schema-per-tenant isolation; statements by SFTP or API.

Single-tenant in your cloud account

Available

Container image and Kubernetes manifests; your keys and archive bucket.

Exit plan by design

Available

Open input formats, exportable results, audit archive in your bucket.

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.

05 Pilot offer

Scope

- Up to 3 safeguarding accounts and 2 currencies.
- Daily statement ingest and reconciliation; break workflow.
- One monthly return draft and an audit export.

Success criteria

- Every business day reconciled automatically, breaks explained.
- Return draft matches your manual figures or differences are explained.

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

€10–30k fixed pilot fee

€2–8k / month subscription after the pilot

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

06 Why us

One module, two regimes

The same engine runs UK CASS 15 and EU EMD/PSD2 rule packs, so a group with UK and EU entities runs one control.

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 AutoRek, Aurum Solutions, Safeheld and the Big Four: established players with references we do not yet have. We offer one engine for books, reconciliation and tamper-evident evidence, a short paid pilot and pricing for smaller firms.

07 Next steps

1. Call: your jurisdictions, accounts and statement formats.
2. Demo on sample statements.
3. Pilot agreement and data-sharing terms.

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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. FCA PS25/12 and FCA Handbook CASS 15 — https://www.fca.org.uk/publications/policy-statements/ps25-12-changes-safeguarding-regime-payments-and-e-money-firms
2. ECB, Instant Payments Regulation — https://www.ecb.europa.eu/paym/retail/instant_payments/html/instant_payments_regulation.en.html
3. MoFo, PSD3 and PSR key developments (timeline) — https://www.mofo.com/resources/insights/260430-psd3-and-the-payment-services-regulation-key-developments
4. DNB, DORA registers of information 2026 — https://www.dnb.nl/en/sector-news/supervision-2026/q1/dora-reporting-dora-registers-of-information-in-march-2026/