COMMERCIAL PROPOSAL · LITHUANIA AND EU E-MONEY INSTITUTIONS

PSD3-ready safeguarding and instant-payments evidence, before 09.04.2027

Daily safeguarding reconciliation, a tamper-evident audit trail for the supervisor and ISO 20022 plumbing — the evidence your re-authorisation file and the Bank of Lithuania will ask for.

For: **Lithuanian and other EU EMIs and payment institutions facing PSD3 re-authorisation and the Instant Payments Regulation**

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

09.10.2025 Verification of Payee mandatory in the euro area[2]	**09.04.2027** IPR deadline for EMIs and PIs in any EU country (instant payments, VoP)[2]	**~27 months** PSD3/PSR: 21-month transition + 6 months for the supervisor to re-authorise EMIs as PIs[1]	**Annually** DORA register of information; your ICT providers need an LEI[4]

01 Your situation

PSD3 and the PSR abolish the separate e-money licence: existing EMIs must be re-authorised as payment institutions within a **21-month transition after entry into force, plus 6 months for the supervisor — about 27 months in total**[1]. Publication in the Official Journal was expected in autumn or late 2026, so application peaks fall in 2027–2028[1]. VoP rules and liability for IBAN/name matching follow the same 27-month schedule[1].

In parallel, the Instant Payments Regulation sets **09.04.2027** as the deadline for EMIs and PIs in every EU country; outside the euro area, receiving starts 09.01.2027 and sending plus VoP 09.07.2027[2].

The Bank of Lithuania supervises hard: **Paytend's licence was revoked in 03.2026**, Payrnet's earlier; the 2026 supervision plan focuses on DORA, AML and payment services[3]. Since 10.2025 non-bank PIs have direct TARGET access[5].

Where it hurts

- Two programmes at once — IPR by 09.04.2027 and a PSD3 application — with the same small compliance and engineering team.
- The re-authorisation file needs evidence, not policies: how funds are safeguarded, reconciled and evidenced day by day.
- Instant payments move the reconciliation problem from end-of-day to real time.
- DORA: you must register your ICT providers, and each needs an LEI, an Art. 30 contract and an exit plan[4].

02 What we deliver, requirement by requirement

We map each obligation to a capability and label its readiness honestly. The SEPA instant and VoP items are on our roadmap with target dates ahead of 09.04.2027; we will confirm them in writing before you rely on them.

REQUIREMENT	HOW WE MEET IT	STATUS
Safeguarding of client funds (EMD/PSD2, national rules)	Daily requirement vs. resource reconciliation with shortfall/excess breaks under the EU rule pack. Daily safeguarding reconciliation, EU EMD/PSD2 safeguarding pack	Pilot by Q1 2027
Reconcile safeguarding accounts against bank statements	camt.053 / camt.054 / MT940 ingest with continuity and consistency checks. Bank statement ingest	Available

REQUIREMENT	HOW WE MEET IT	STATUS
Evidence for the supervisor and auditors	Every reconciliation, break and decision sealed into a WORM archive with Merkle proofs; export per record. Immutable audit trail (WORM + Merkle)	Available
PSD3/PSR re-authorisation file[1]	Evidence pack generated from live data: safeguarding method, reconciliation history, controls and audit extracts. PSD3/PSR evidence pack	Roadmap by Q2 2027
ISO 20022 payment messages	pacs.008 out, pacs.002 status, pacs.004 returns, camt.056 recalls, camt.054 notifications — already implemented. ISO 20022 messaging	Available
SCT Inst readiness by 09.04.2027[2]	SCT Inst rulebook handling on top of our ISO 20022 messages and real-time reconciliation. ISO 20022 messaging, SEPA scheme pack	Roadmap by Q1 2027
Verification of Payee[2]	IBAN/name check step in the payment flow, result kept in the audit trail. Verification of Payee	Roadmap by Q1 2027
AML focus of the 2026 supervision plan[3]	Rule-based monitoring, risk scoring, cases and sanctions screening (OFAC today; EU/UN lists in the pilot). Transaction monitoring and sanctions screening, Further sanctions lists	Pilot by Q1 2027
DORA Art. 30 contract, register of information, exit plan[4]	Contract template, exit plan and BCP/DR description; LEI for the register. Vendor due-diligence pack	Roadmap by Q1 2027

03 Deployment and data residency

EU data, EU contract counterparty, your choice of hosting.

Hosted SaaS in an EU region

Pilot by Q1 2027

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

Single-tenant in your EU cloud account

Available

Container image and Kubernetes manifests; your keys, your archive bucket with Object Lock.

Exit plan by design

Available

Open formats in, exportable results and audit archive in your bucket — the DORA exit plan is concrete, not theoretical.

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.
- LEI and an EU (Lithuanian) legal entity as contract counterparty: planned in the first months, before the first contract.

05 Pilot offer

Start with safeguarding — it is needed under today's rules and under PSD3 — and add the instant-payments track as it lands.

Scope

- Daily safeguarding reconciliation on your real statements (up to 3 accounts).
- Break workflow and the monthly safeguarding report under the EU rule pack.
- Audit evidence export in the form your supervisor and auditor expect.
- Gap review of your IPR/VoP plan against our ISO 20022 components.

Success criteria

- Daily reconciliation running automatically, breaks explained.
- An evidence pack you can attach to your re-authorisation file.
- A dated plan for SCT Inst/VoP agreed in writing.

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 product for both deadlines

Safeguarding, reconciliation and ISO 20022 come from one engine, so PSD3 evidence and instant-payment reconciliation share the same books and audit trail.

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 Mambu, Thought Machine and local integrators: large core vendors fit large institutions, and integrators build per project. We are a module you can add next to your current core, with a supervisor-ready evidence pack as the product, not as consulting.

07 Next steps

1. Call: your PSD3 timeline, IPR status and safeguarding method.
2. Demo in an EU region: reconciliation, a shortfall break and an audit proof checked against the archive.
3. Pilot agreement and DORA-aligned contract 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. A&L Goodbody, PSD3/PSR for fintechs; MoFo, PSD3 and PSR key developments (timeline) — https://www.mofo.com/resources/insights/260430-psd3-and-the-payment-services-regulation-key-developments
2. ECB, Instant Payments Regulation; Worldline on non-euro deadlines — https://www.ecb.europa.eu/paym/retail/instant_payments/html/instant_payments_regulation.en.html
3. Bank of Lithuania, Paytend Europe UAB has lost its licence; Ecovis RegRally 03.2026 — https://www.lb.lt/en/commentary/paytend-europe-uab-has-lost-its-licence
4. DNB, DORA registers of information 2026 (LEI/EU-ID for ICT providers); CSSF, AFM — https://www.dnb.nl/en/sector-news/supervision-2026/q1/dora-reporting-dora-registers-of-information-in-march-2026/
5. Bank of Lithuania, payments news (TARGET access for non-bank PIs) — https://www.lb.lt/en/news/theme.Payments

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