COMMERCIAL PROPOSAL · SINGAPORE

Fiat and token safeguarding in one ledger, with reserves you can attest

Customer fiat and digital payment tokens on one double-entry engine, daily reconciliation of trust accounts and custody, and evidence for the monthly reserve attestation MAS is consulting on.

For: **MAS major payment institutions with e-money or DPT services, and prospective stablecoin issuers** Date: **22.11.2026**

Indicative — not an offer to contract

04.04.2024
DPT custody and token transfers brought into the PSA perimeter[2]

04.10.2024
DPT customer-asset safeguarding rules in force[2]

01.09.2026
MAS consultation on PSA amendments for stablecoins[3]

Monthly
proposed independent reserve attestation, published; annual audit[3]

01 Your situation

Under the Payment Services Act, MAS licenses major and standard payment institutions[1]. Since **04.10.2024** DPT service providers must keep customer assets in trust, with an independent custodian, records of each asset's status and key protection; MAS may extend safeguarding to further licence classes[2].

On **01.09.2026** MAS consulted on PSA amendments for stablecoins: value stability, capital, redemption at par, a **monthly independent attestation of reserves that is published**, and an annual audit[3][4]. There is no data-localisation rule; outsourcing follows MAS technology-risk and outsourcing guidance (due diligence, audit rights).

Where it hurts

- Fiat float, DPT customer assets and the firm's own inventory are reconciled in separate tools.
- A monthly published attestation leaves no room for month-end spreadsheet work.
- Global cores and custody providers each cover one side; few products reconcile trust accounts and on-chain reserves together for mid-sized MPIs (our assessment).
- Buyers need vendor due diligence and audit rights from day one.

02 What we deliver, requirement by requirement

REQUIREMENT	HOW WE MEET IT	STATUS
DPT customer assets held in trust, records of each asset's status[2]	Per-customer wallets on the double-entry engine; customer assets and the firm's own position on separate accounts. Omnibus custody sub-ledger	Available
Daily reconciliation of customer DPT with custody	Per-asset reconciliation: liabilities vs. custodian holdings vs. custody book, with in-flight operations. Proof-of-reserves reconciliation, Connector to your custodian	Pilot by Q1 2027
Trust and float accounts reconciled with bank statements	camt.053 / camt.054 / MT940 ingest; daily requirement-vs-resource reconciliation and breaks. Bank statement ingest, Daily safeguarding reconciliation	Available
Monthly independent reserve attestation, published (proposed)[3]	Reserves history and evidence pack for your attesting firm; MAS-specific report format. Auditor-ready reserves report, MAS rule pack	Roadmap by Q2 2027
Annual audit[3]	Sealed WORM audit with Merkle proofs, exportable per record. Immutable audit trail (WORM + Merkle)	Available

REQUIREMENT	HOW WE MEET IT	STATUS
Redemption at par (proposed) [3]	Issuance and redemption tracked as ledger postings against reserves. Double-entry ledger, MAS rule pack	Roadmap by Q2 2027
Outsourcing due diligence and audit rights	Single-tenant deployment you control; due-diligence pack with contract template and exit plan. Deploy anywhere, Vendor due-diligence pack	Roadmap by Q1 2027

03 Deployment and data residency

Single-tenant in a Singapore region

Available

Your cloud account, deployed from our Kubernetes manifests; your keys and archive.

Hosted SaaS

Roadmap by Q2 2027

Schema-per-tenant isolation, Singapore region.

Exit plan

Available

Open formats and 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.
- SOC 2 Type I: planned for our second wave. Singapore entity only if a client requires it.

05 Pilot offer

Scope

- Connector to your custodian and daily reserve reconciliation for up to 5 assets.
- Trust/float account reconciliation on your statements.
- One month of reserves evidence prepared for your attesting firm.

Success criteria

- Daily coverage shown for the full pilot period.
- Your attesting firm confirms the evidence format is usable.

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

from $30k paid pilot
Subscription quoted after the pilot

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

06 Why us

One ledger for fiat and tokens

The same double-entry engine holds money and digital assets, so trust-account and on-chain reconciliations come from one set of books.

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 Thought Machine, Mambu, 10x, Nium, Matchmove, Fireblocks and Duco: cores, BaaS, custody and reconciliation are each strong in their lane. We connect the lanes for safeguarding and reserves and deploy quickly for mid-sized MPIs.

07 Next steps

1. Call: your licence, assets, custodian and attestation plans.
2. Demo: reserves reconciliation and an audit proof.
3. Paid pilot in a Singapore region.

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. MAS, Major Payment Institution licence (Payment Services Act 2019) — https://www.mas.gov.sg/regulation/payments/major-payment-institution-licence
2. Allen & Gledhill, 2024 PSA amendments on DPT; MAS media release 2024 — https://www.mas.gov.sg/news/media-releases/2024/mas-expands-scope-of-regulated-payment-services
3. MAS, consultation on legislative amendments to implement the stablecoin framework (2026) — https://www.mas.gov.sg/news/media-releases/2026/mas-consults-on-legislative-amendments-to-implement-stablecoin-regulatory-framework
4. Sidley, MAS charts the next phase of stablecoin regulation (09.2026) — https://www.sidley.com/en/insights/newsupdates/2026/09/mas-charts-the-next-phase-of-stablecoin-regulation-in-singapore