

FINANCE

# Regulatory Alignment

WHITE PAPER · 2026 EDITION

*Designed to operate within UK and Zimbabwe law*

## Regulatory Alignment

ZimX is designed from the ground up to operate within the regulatory frameworks of both the United Kingdom and Zimbabwe. Compliance is not a feature added to an existing product. It is embedded in the architecture from the first design decision. This document provides an overview of ZimX's regulatory approach, the legal context in both jurisdictions, and the compliance framework built into the platform.

### Design Philosophy

#### Regulatory controls are embedded at the system level.

Compliance is considered in every architectural decision. Regulatory alignment is prioritised over speed of deployment. Where there is a choice between launching faster or launching compliant, ZimX chooses compliant. The approach is proactive engagement, willingness to adapt based on regulatory feedback, and long-term orientation. The goal is not to find the minimum viable compliance. It is to build a platform that regulators in both jurisdictions can point to as an example of how digital financial infrastructure should work.

## United Kingdom

ZimX Finance is incorporated in England and Wales as the dedicated operating entity.

The UK is establishing a dedicated regulatory framework for cryptoasset and stablecoin-based payment services. The Financial Services and Markets Act 2000 (Cryptoassets) Regulations 2026 creates a defined authorisation pathway for firms issuing and managing reserve-backed payment instruments. For the first time, there is a legislated, supervised pathway for this category of financial product —not a grey area, not a regulatory gap, but a purpose-built regime with clear requirements for safeguarding, redemption, disclosure, and consumer protection.

#### ZimX is designed to meet the requirements of this regime.

Reserves are held in high-quality liquid assets consistent with the standards contemplated by UK legislation for reserve-backed stablecoin issuers. Safeguarding, redemption, and disclosure mechanisms are built into the platform architecture. Consumer protection is integrated at every touchpoint.

ZimX has engaged with available regulatory innovation and pre-application pathways. This engagement does not constitute authorisation, approval, or endorsement. No determination has been made by UK regulators. The FCA cryptoassets authorisation gateway is expected to open in late 2026, with full regime commencement in late 2027. ZimX intends to submit a complete authorisation application when the gateway opens.

## Zimbabwe

Zimbabwe's regulatory landscape for digital financial services has undergone significant development in recent years, creating multiple pathways for platforms like ZimX to operate legally and with regulatory oversight.

### Finance Act 2025

The Finance Act 2025 enacts enabling legislation establishing definitions for virtual assets and creating licensing frameworks for virtual asset service providers (VASPs) under the supervision of the Securities and Exchange Commission of Zimbabwe (SECZ). This represents the first comprehensive legislative framework for digital asset businesses operating in or serving Zimbabwe. The Act provides legal definitions, licensing requirements, and a supervisory structure that did not previously exist. For ZimX, this means there is now a defined legal pathway for operating in Zimbabwe, rather than operating in a regulatory vacuum.

### Zimbabwe National AI Strategy (2026–2030)

In March 2026, the Government of Zimbabwe published the Zimbabwe National Artificial Intelligence Strategy (2026–2030). This is a 69-page presidential-level policy framework that establishes AI as a national strategic priority and creates dedicated infrastructure for AI-driven innovation across the economy. Three elements of this strategy are directly relevant to ZimX.

**Policy alignment.** The strategy explicitly prioritises AI-driven financial inclusion (alternative credit scoring, mobile money optimisation, fraud detection), AI for MSMEs (chatbots, predictive analytics, automated logistics), and diaspora engagement as a strategic national asset. ZiRA already delivers these capabilities —live, in Shona, Ndebele, and English, with over 12,500 knowledge base entries. ZimX is not building into a policy vacuum. The government is actively creating policy and regulatory infrastructure closely aligned with the type of infrastructure ZimX is building.

**New regulatory pathways.** The strategy establishes an AI Regulatory Sandbox (“Innovation Crucible”) managed jointly by POTRAZ and the RBZ, specifically designed for AI startups to test solutions under temporary regulatory flexibility. This is a second sandbox pathway alongside the existing RBZ Fintech Regulatory Sandbox. ZimX is engaging with both sandbox pathways as they become available. The strategy also establishes a National AI Council for governance oversight and a National Digital Regulatory Committee under POTRAZ for sector-specific regulation.

**Potential funding.** The strategy creates a National AI Innovation Fund (“Mugove/Isabelo Fund”) —a government co-investment fund matching private investment in certified AI startups. While the fund’s operational timeline is not yet confirmed, ZimX’s AI-first infrastructure may align with the type of startup activity contemplated by the fund, subject to eligibility rules, certification requirements, and the fund’s operational launch.

#### Local Banking Partnership

Full PSP licensing in Zimbabwe (outside sandbox corridors) requires ZimX to partner with a local bank, which must submit the application on the firm’s behalf in accordance with RBZ minimum requirements for retail payment service providers. This is standard practice in Zimbabwe —EcoCash operates through Steward Bank, and other fintechs have followed similar models. Securing a qualified local banking partner remains a first-class dependency for full Zimbabwe licensing and commercial operation. ZimX is actively evaluating potential banking partners.

The precise regulatory classification of ZIGX and ZIMX under Zimbabwean law will be determined as implementing regulations under the Finance Act 2025 are developed. ZimX confirms its intention to comply with all applicable requirements in both jurisdictions.

#### Broader Context

Zimbabwe was removed from the FATF grey list in March 2022, a significant milestone that reduced international compliance barriers for financial services operating in or with Zimbabwe. The UK removed the last remaining entries from its Zimbabwe sanctions list in May 2025, with the FCDO confirming the delisting of all designated persons and entities. The National Development Strategy 2 (2026–2030) targets 90%+ financial inclusion with digital-first mandates. The Zimbabwe National AI Strategy (2026–2030) further reinforces this direction by establishing AI-driven financial services as a priority adoption sector with dedicated governance infrastructure, regulatory sandboxes, and government co-investment mechanisms.

The combined effect of these developments is that both the UK and Zimbabwe are actively building the regulatory infrastructure that ZimX needs to operate. This is not a platform seeking to exploit regulatory gaps. It is a platform designed to operate within frameworks that are being purpose-built for exactly this category of financial product.

## ■ Compliance Framework

### ■ Consumer Protection

ZimX is designed with consumer protection at every touchpoint. Users always know what they are paying, what the recipient will receive, and where to go if something goes wrong.

### ■ Intellectual Property

ZIMX<sup>®</sup>, ZIGX<sup>®</sup>, and ZiRA<sup>®</sup> are registered trademarks of BlackMass Enterprises Ltd in the UK. ARIPO filings are in progress across African member states, with international expansion in process under the Madrid Protocol.

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