



Finance

Regulatory Alignment

White Paper · 2026 Edition

Designed to operate within UK and Zimbabwean law.

BlackMass Enterprises Ltd
UK Company No. 16124799

ZimX Finance is not authorised, licensed, or registered to provide regulated financial services in any jurisdiction at the date of this document.

Regulatory Alignment

ZimX is designed from the ground up to operate within the regulatory frameworks of both the United Kingdom and Zimbabwe. Compliance is embedded in the architecture, not layered on after the fact. This document provides an overview of ZimX's regulatory approach and the legal context in which the platform is being built.

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. The approach is proactive engagement, willingness to adapt, and long-term orientation.

United Kingdom

BlackMass Enterprises Ltd (UK Company No. 16124799) is incorporated in England and Wales. ZimX Finance Ltd is in incorporation as the dedicated operating subsidiary. All intellectual property is held by BlackMass Enterprises Ltd.

The UK is establishing a defined regulatory framework for stablecoin-based payment services. For the first time, there is a legislated pathway for this category of financial product. ZimX is designed to meet the requirements of this emerging regime, including safeguarding, redemption, and disclosure standards.

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. Based on HM Treasury and FCA publications as of February 2026, the FCA cryptoassets authorisation gateway is expected to open on 30 September 2026 and close on 28 February 2027, with full regime commencement on 25 October 2027 as enacted in the Financial Services and Markets Act 2000 (Cryptoassets) Regulations 2026. These dates remain subject to change. ZimX intends to submit a complete authorisation application within this window.

Zimbabwe — National AI Strategy, RBZ & Regulatory Landscape

Zimbabwe's Finance Act 2025 enacts enabling legislation establishing definitions for virtual assets and creating licensing frameworks for virtual asset service providers. This represents the first comprehensive legislative framework for digital asset businesses operating in or serving Zimbabwe.

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. ZimX is not building into a policy vacuum. The government is actively creating the infrastructure to support exactly what ZimX offers.

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, to which ZimX submitted application materials in December 2025 (decision pending). ZimX intends to explore application to the Innovation Crucible once operational. 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 is positioned to qualify as a certified AI startup operating in a priority sector identified by the strategy.

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. Securing a qualified local banking partner remains a first-class dependency for full Zimbabwe licensing and commercial operation.

The precise regulatory classification of ZiGX and ZIMX under Zimbabwean law will be

determined as implementing regulations 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. 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 on 27 May 2025. The National Development Strategy 2 (2026–2030) targets 90%+ financial inclusion with digital-first mandates. The Zimbabwe National AI Strategy (2026–2030), published March 2026, 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.

Compliance Framework

ZiRA™’s (Zimbabwe Resource Assistant) AI-powered onboarding includes identity document verification, proof of address, biometric verification, liveness detection, and risk-based tiering. Sanctions screening covers OFAC, UN, and EU lists. Transaction monitoring is designed for continuous analysis with pattern detection and full audit trail maintenance.

Consumer Protection

ZimX is designed with consumer protection at every touchpoint: pre-transaction fee disclosure, accessible terms of service, risk warnings, multi-factor authentication, transaction limits, fraud monitoring, and clear complaint procedures with escalation pathways.

Intellectual Property

ZIMX® and ZiGX® are registered trademarks in the UK. Filings are in place across 12 ARIPO African member states, with

international expansion in process under the Madrid Protocol. All intellectual property is owned by BlackMass Enterprises Ltd.

ZimX Finance is in development and not yet operational. This document is for informational purposes only and does not constitute an offer of securities, investment advice, or a guarantee of any outcome. All forward-looking statements are conditional on regulatory permission, audit completion, and operational readiness.