

HO Batch Provisional Digital Operations Authorization (PDOA)

GAZZETTA UFFICIALE DELL'ORDINE SOVRANO MILITARE DI MALTA

OFFICIAL GAZETTE OF THE SOVEREIGN MILITARY ORDER OF MALTA (GUOSMM)

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Series	E
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HO Batch Provisional Digital Operations Authorization (PDOA)

Section 1 — Purpose

This notice authorizes **bounded institutional digital operations** for HO batch entities **pending completion** of Track B external requirements (GLEIF LEI, domains, local registry filings). Issuance is by **SHOSJJ Licensing Authority** acting for the sovereign authority under its official long name (SMOM / SHOSJJ designations), not OMNL or nation-state regulators.

Mandatory disclosure (all digital surfaces):

Provisional Order authorization — not a national banking, e-money, or insurance license. Subject to 2-year sandbox maximum; 6-month progress review.

Section 2 — Covered institutions

Entity	GUOSMM charter	SHOSJJ license ID	Fineract office
zBank	GUOSMM-C-2026-003	LICENSE-ZBANK-SHOSJJ-2026-003	19 / ZBANK-OMNL
NovaBank	GUOSMM-C-2026-004	LICENSE-NOVABANK-SHOSJJ-2026-004	01NOVABANK-OMNL
AnakaBank	GUOSMM-C-2026-005	LICENSE-ANAKABANK-SHOSJJ-2026-005	01ANAKABANK-OMNL

Entity	GUOSMM charter	SHOSJJ license ID	Fineract office
Hermes Insurance	GUOSMM-B-2026-003	LICENSE-HERMES-SHOSJJ-2026-001	HERMES-OMNL

Legacy Fineract routing IDs (*-OMNL) are operational aliases only — see GUOSMM-E-2026-002 issuance schedule.

Section 3 — Allowed digital surfaces (institutional only)

1. Fineract / OMNL ledger (offices 29–32) — institutional KYB; maker-checker pool enforced.
2. Institutional banking portal and API — no retail marketing; PDOA disclosure banner required.
3. ISO 20022 institutional messaging — evidence correlation (C9).
4. Chain 138 institutional settlement — where URA policy profile applies.
5. Hermes programme/captive digital — GUOSMM-B-2026-004 scope only; no admitted-market insurance sales.
6. Sandbox/stub integrations — operator ack HO_BATCH_PDPA_ACK=1 only.

Section 4 — Forbidden until full Track B closure

Retail deposits; FDIC or statutory deposit insurance claims; correspondent KYB without GLEIF-issued LEI; public .org branding as fully licensed banks; live card-push to US consumers; admitted-market insurance; Tier 2–5 full-authorization claims; SWIFT / Fedwire / BIS membership claims.

Section 5 — Review schedule (every 6 months)

Review	Due	Milestones
PDOA-R1	2027-01-01	M1 — LEI submitted/issued all four
PDOA-R2	2027-07-01	M2 domains; M3 governance fit-and-proper
PDOA-R3	2028-01-01	M4 priority jurisdiction filings submitted
PDOA-R4	2028-06-30	M6 exit — full authorization or wind-down

Fail-closed: two consecutive missed reviews; AML/sanctions breach; prohibited external claim; hard sunset without exit plan.

Section 6 — Suspension and revocation

Suspension or revocation under GUOSMM-A-2026-002 through the **SHOSJJ Licensing Authority** → Licensing Governance Board → Grand Chancellor. OMNL may impose prudential holds independently; OMNL holds do not substitute for Licensing Authority revocation.

Section 7 — Counsel

Supplemental program counsel attestation: **ho-batch-provisional-digital-operations-counsel-signoff** (narrow PDOA scope; does not amend G9 charter attestation).

Section 8 — Amendment

Superseded only by successor Series E notice or Tier 1 act extending or terminating PDOA before sunset.

Sovereign authority: Sovereign Military Hospitaller Order of St John of Jerusalem of Rhodes and of Malta (SMOM / SHOSJJ) · License issuer: SHOSJJ Licensing Authority · Prudential supervisor: OMNL (not licensor)