



WHITEPAPER

Financial Identity Infrastructure™

A Regulatory Position Paper on Non-Custodial Financial Infrastructure

Version 1.0

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Publisher

World Blockchain Bank™

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Foreword from the Founder

For more than a century, financial regulation has focused on institutions that hold, transfer, safeguard, or intermediate customer assets.

World Blockchain Bank™ was deliberately designed around a different principle.

Rather than building another financial institution, we asked a more fundamental question:

What if the future of finance begins with identity rather than custody?

The result is **Financial Identity Infrastructure™** — a non-custodial technology architecture that enables individuals, businesses, institutions, governments, and AI agents to establish trusted financial identities while maintaining exclusive control over their own assets.

This paper is intended to contribute constructively to the ongoing discussion surrounding blockchain infrastructure, digital identity, decentralized commerce, and responsible regulatory innovation.

We hope it serves as a useful technical reference for regulators, policymakers, financial institutions, legal professionals, enterprise organizations, and technology leaders seeking to understand this emerging infrastructure category.

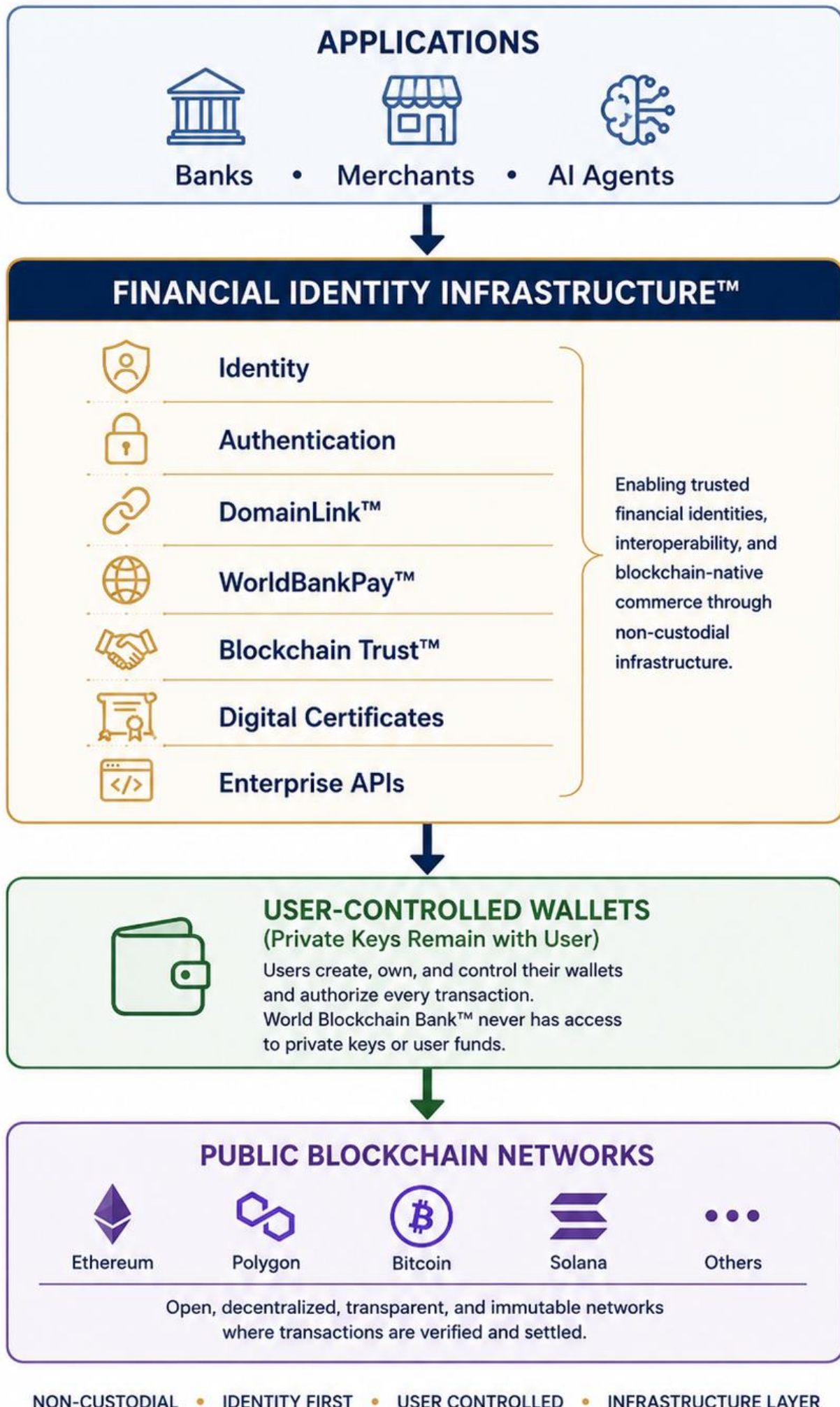
Stephan Schurmann

Founder & Executive Chairman

World Blockchain Bank™

FINANCIAL IDENTITY INFRASTRUCTURE™

ARCHITECTURE OVERVIEW



Executive Summary

The financial services industry has historically classified organizations into categories such as banks, payment processors, money transmitters, custodians, broker-dealers, exchanges, and wallet providers.

These classifications assume that the service provider accepts, controls, transfers, settles, or safeguards customer assets.

World Blockchain Bank™ ("WBB") was intentionally engineered using a fundamentally different architecture.

Rather than acting as a financial intermediary, WBB provides a **non-custodial Financial Identity Infrastructure™** that enables individuals, businesses, merchants, institutions, and autonomous AI agents to establish verified digital financial identities capable of participating directly in blockchain-based commerce.

At no time does WBB take custody of customer funds or private keys.

Instead, WBB provides the infrastructure through which users interact directly with decentralized blockchain networks while maintaining exclusive control over their own wallets and digital assets.

This paper explains why Financial Identity Infrastructure™ represents a distinct category of financial technology that differs materially from traditional regulated financial intermediaries.

Important Notice

This document is intended solely to describe the technical architecture and operational model of World Blockchain Bank™. It does not constitute legal advice, regulatory guidance, or a legal opinion regarding the application of any law in any jurisdiction. Regulatory classification depends upon applicable law and the actual activities conducted within each jurisdiction.

1. The Evolution of Financial Infrastructure

Financial infrastructure has evolved through several generations.

Generation 1

- Banks
- Stored money.
- Transferred money.
- Maintained ledgers.

Generation 2

- Card Networks
 - Connected banks.
 - Processed transactions.
 - Collected percentage fees.
-

Generation 3

- Internet Payments
 - Digital wallets.
 - Merchant gateways.
 - Online commerce.
-

Generation 4

- Blockchain Networks
 - Peer-to-peer settlement.
 - Digital assets.
 - Self-custody.
 - Programmable value.
-

Generation 5

- Financial Identity Infrastructure™
 - Identity-first architecture.
 - Direct settlement.
 - Programmable commerce.
 - AI-native financial identities.
-

2. What Is Financial Identity Infrastructure™?

Financial Identity Infrastructure™ is the digital layer that enables individuals, organizations, merchants, governments, and autonomous software agents to establish verifiable financial identities capable of participating in commerce without requiring an intermediary to hold or control customer assets.

The infrastructure combines:

- Financial Identity™
- DomainLink™

- WorldBankPay™
 - Blockchain Trust™
 - Digital Certificates
 - Merchant Infrastructure
 - Identity Verification
 - Blockchain Registration
 - AI Identity
 - Enterprise Infrastructure Licensing™
-

3. What World Blockchain Bank™ Does

World Blockchain Bank™ provides software and blockchain-native infrastructure enabling users to:

- establish financial identities
 - activate blockchain payment endpoints
 - register blockchain assets
 - tokenize eligible assets
 - authenticate ownership
 - issue blockchain certificates
 - manage blockchain trust relationships
 - verify digital identities
 - enable direct blockchain settlement
 - integrate with enterprise applications
-

4. What World Blockchain Bank™ Does NOT Do

World Blockchain Bank™ does not:

- accept customer deposits
- custody customer funds
- custody digital assets
- hold customer private keys
- manage customer wallets
- execute transactions on behalf of customers
- take possession of customer assets
- become counterparty to customer transactions

- lend customer funds
- create fractional reserve banking
- rehypothecate customer assets

Users remain in complete control of their own wallets and private keys at all times.

5. The Non-Custodial Architecture

The WBB platform was intentionally designed around a non-custodial model.

Each participant:

- Owns their wallet.
- Controls their private keys.
- Authorizes every transaction.
- Receives funds directly.
- Maintains exclusive custody of assets.

World Blockchain Bank™ cannot:

- Freeze assets.
- Reverse payments.
- Access wallets.
- Transfer customer funds.
- Confiscate assets.

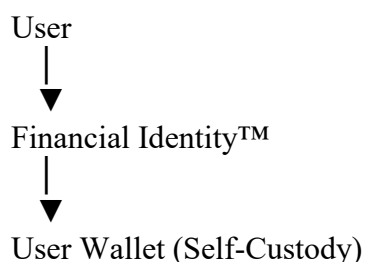
This architecture minimizes centralized custodial risk while enabling direct blockchain settlement.

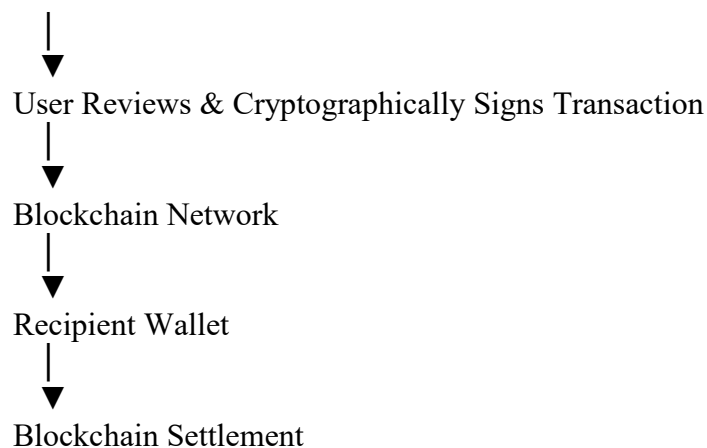
6. Functional Analysis of World Blockchain Bank™

One of the most important aspects of World Blockchain Bank™ is that it operates as **non-custodial financial infrastructure** rather than as a financial intermediary.

To understand the distinction, it is helpful to examine how a transaction actually occurs within the World Blockchain Bank™ ecosystem.

Transaction Flow





Role of World Blockchain Bank™

World Blockchain Bank™ participates **before** and **around** the transaction by providing the digital infrastructure that enables trusted interaction between participants.

The platform provides:

- Financial Identity Infrastructure™
- DomainLink™ Identity Resolution
- Identity Authentication
- Blockchain Registration
- Merchant Infrastructure
- Payment Endpoint Activation
- Blockchain Trust™
- Digital Certificate Infrastructure
- AI-Ready Financial Identities
- Enterprise APIs
- Infrastructure Monitoring
- Identity Verification Services

Once a transaction is authorized by the user, it is transmitted directly across the applicable blockchain network between the participating wallets.

At no point does World Blockchain Bank™ become a counterparty to the transaction or assume custody of customer assets.

Functional Separation

The following table illustrates the separation of responsibilities between the platform and the user.

User Functions	World Blockchain Bank™ Functions
Creates or connects a wallet	Issues and manages Financial Identity™ infrastructure
Maintains custody of digital assets	Provides DomainLink™ identity services
Controls private keys	Provides identity verification infrastructure
Reviews transaction details	Provides blockchain registration services
Cryptographically signs every transaction	Activates payment endpoints
Chooses recipient	Provides Blockchain Trust™ services
Broadcasts transaction through wallet software	Provides merchant infrastructure
Retains full ownership of assets	Provides enterprise integration APIs
Receives funds directly	Provides digital certificate infrastructure

World Blockchain Bank™ Never

World Blockchain Bank™ does **not** perform the following activities:

- Hold customer funds
- Custody digital assets
- Control customer wallets
- Store customer private keys
- Sign transactions on behalf of users
- Execute transactions on behalf of users
- Take possession of customer assets
- Become counterparty to customer transactions
- Freeze customer assets
- Reverse blockchain transactions
- Lend customer assets
- Rehypothecate customer assets
- Create fractional-reserve liabilities

Regulatory Significance

This functional separation is fundamental to the architecture of World Blockchain Bank™.

Unlike traditional financial institutions, custodial wallet providers, exchanges, or payment processors, World Blockchain Bank™ is designed as an **identity-first infrastructure platform**.

Its primary role is to establish trusted digital financial identities and provide the infrastructure that enables users to interact directly with decentralized blockchain networks while retaining exclusive control over their own wallets, private keys, and digital assets.

Accordingly, any regulatory assessment of World Blockchain Bank™ should focus on the **actual technical functions performed by the platform**, rather than assumptions based on legacy financial institution models or terminology.

As a result, the platform should be evaluated based on its role as a **non-custodial Financial Identity Infrastructure™ provider**, where identity, authentication, registration, and interoperability are the core services, while asset custody and transaction authorization remain exclusively under the control of the user.

7. Functional Separation

One of the defining characteristics of World Blockchain Bank™ is the deliberate separation of responsibilities between the **user** and the **platform**.

Unlike traditional financial institutions, custodial wallet providers, or payment processors, World Blockchain Bank™ does not assume control over customer assets or execute transactions on behalf of users.

Instead, the platform provides the foundational infrastructure that enables users to establish trusted financial identities while retaining complete ownership and control of their digital assets.

This separation of functions is central to the non-custodial architecture of Financial Identity Infrastructure™.

Functional Responsibility Matrix

Functions Performed by the User	Functions Performed by World Blockchain Bank™
Creates or imports a self-custody wallet	Registers Financial Identity™
Generates and securely stores private keys	Creates blockchain-based financial identities
Maintains exclusive custody of digital assets	Activates and manages DomainLink™ identities
Owens and controls all wallets	Provides Financial Identity Infrastructure™
Reviews every transaction before approval	Activates blockchain payment endpoints
Cryptographically signs every transaction	Provides Blockchain Trust™ infrastructure
Selects the recipient or destination wallet	Registers blockchain identities and ownership records
Determines the transaction amount	Issues blockchain-based digital certificates
Broadcasts transactions through their wallet	Provides merchant onboarding infrastructure
Receives funds directly into their wallet	Provides merchant payment infrastructure
Maintains sole ownership of all assets	Provides enterprise integration APIs
Determines when and whether to transact	Provides identity verification services
Controls access to their own accounts	Provides AI-ready Financial Identity™ infrastructure
Manages wallet backups and recovery phrases	Provides interoperability between identity and payment layers

Regulatory Importance

This functional separation demonstrates that World Blockchain Bank™ operates as an **infrastructure provider rather than a financial intermediary**.

The platform establishes identity, trust, interoperability, and payment infrastructure while the user retains exclusive authority over all financial decisions and digital assets.

At no point does World Blockchain Bank™:

- Accept customer deposits
- Hold customer funds
- Custody digital assets
- Generate or store customer private keys

- Control customer wallets
- Authorize transactions
- Sign transactions on behalf of users
- Determine transaction recipients
- Transfer customer assets
- Become a counterparty to customer transactions

Instead, every transaction remains under the exclusive control of the user, who authorizes and cryptographically signs each transaction directly from their own self-custody wallet.

This architecture fundamentally distinguishes **Financial Identity Infrastructure™** from traditional banking, custodial wallet services, payment processors, money transmitters, exchanges, and other financial intermediaries whose business models rely upon taking possession of, controlling, or transmitting customer assets.

Accordingly, World Blockchain Bank™ should be evaluated based on the **actual technical functions it performs**—identity infrastructure, authentication, blockchain registration, merchant enablement, and interoperability—rather than by analogy to institutions whose core function is the custody or movement of customer funds.

8. Regulatory Functional Mapping

Evaluating World Blockchain Bank™ Based on Its Actual Functions

Financial regulation has historically focused on organizations that accept deposits, custody customer assets, transmit money, exchange value, or otherwise act as financial intermediaries.

Accordingly, World Blockchain Bank™ should be evaluated based on the **actual technical and operational functions performed by the platform**, rather than assumptions arising from legacy financial industry terminology.

The following matrix provides a functional analysis of the services provided by World Blockchain Bank™.

Regulatory Functional Mapping Matrix

Activity	Performed by World Blockchain Bank™	Comments
Accept customer deposits	No	Customer assets are never deposited with World Blockchain Bank™.
Hold customer funds	No	Users retain exclusive custody of their own assets at all times.
Custody digital assets	No	Digital assets remain within user-controlled self-custody wallets.
Hold or manage private keys	No	Private keys are generated, stored, and controlled exclusively by the user.
Create or control customer wallets	No	Users create or connect their own compatible blockchain wallets.
Execute transactions on behalf of users	No	Every transaction is initiated and cryptographically authorized by the user.
Sign blockchain transactions	No	Only the wallet owner signs blockchain transactions using their private keys.
Receive customer assets	No	Customer assets never pass through World Blockchain Bank™ infrastructure.
Take possession of customer assets	No	The platform never becomes the custodian or temporary holder of customer assets.
Exchange digital assets	No	World Blockchain Bank™ does not operate an exchange or matching engine.
Convert fiat to digital assets	No	Currency conversion is not performed by the platform.
Convert digital assets to fiat	No	Redemption or conversion services are not provided by the platform.
Lend customer assets	No	The platform does not originate loans or utilize customer assets for lending.
Borrow customer assets	No	Customer assets are never borrowed or pledged.
Rehypothesize customer assets	No	Customer assets are never reused, pledged, or encumbered.
Freeze customer assets	No	World Blockchain Bank™ has no technical ability to freeze user-controlled wallets.
Reverse blockchain transactions	No	Confirmed blockchain transactions cannot be reversed by the platform.
Control user accounts or balances	No	Wallet balances remain under the exclusive control of the user.

Activity	Performed by World Blockchain Bank™	Comments
Operate Financial Identity Infrastructure™	Yes	Provides blockchain-native financial identity infrastructure for individuals, businesses, institutions, and AI agents.
Register Financial Identities™	Yes	Creates and maintains blockchain-registered financial identities.
Provide DomainLink™ infrastructure	Yes	Enables human-readable financial identity namespaces and payment endpoints.
Activate blockchain payment endpoints	Yes	Connects Financial Identities™ to blockchain-based payment functionality.
Provide Blockchain Trust™ infrastructure	Yes	Delivers blockchain-based trust, ownership, and digital relationship infrastructure.
Register blockchain assets	Yes	Enables immutable blockchain registration of eligible digital records and assets.
Issue blockchain digital certificates	Yes	Provides blockchain-verifiable digital certificates and ownership records.
Provide merchant infrastructure	Yes	Enables merchants to establish blockchain-native payment identities and infrastructure.
Provide enterprise integration services	Yes	Offers APIs and enterprise infrastructure integration capabilities.
Provide AI-ready Financial Identity™ infrastructure	Yes	Supports machine-readable identities designed for autonomous AI commerce.

Functional Classification

The Regulatory Functional Mapping Matrix demonstrates that World Blockchain Bank™ performs **identity, infrastructure, authentication, registration, and interoperability functions**, while deliberately avoiding activities associated with custodial financial intermediaries.

The platform's principal purpose is to provide:

- Financial Identity Infrastructure™
- Identity verification
- Blockchain registration
- Merchant enablement
- Payment endpoint activation
- Blockchain Trust™ infrastructure
- Digital certificate services

- Enterprise interoperability
- AI-ready identity infrastructure

Conversely, World Blockchain Bank™ does **not**:

- Hold customer money
- Hold digital assets
- Maintain custody of private keys
- Operate customer wallets
- Execute transactions on behalf of users
- Exchange digital assets
- Process fiat conversions
- Lend customer assets
- Act as a financial intermediary

Regulatory Perspective

This functional analysis illustrates that World Blockchain Bank™ is designed as an **identity-first, non-custodial financial infrastructure platform** rather than a custodial financial institution.

Accordingly, regulatory evaluation should focus on the **actual operational functions performed by the platform**, recognizing the distinction between **software infrastructure that enables users to transact directly** and **financial intermediaries that take possession or control of customer assets**.

This functional approach provides regulators, policymakers, enterprise partners, and legal advisors with a transparent framework for assessing World Blockchain Bank™ based on its architecture, technical capabilities, and operational responsibilities rather than by comparison with legacy financial institution models.

9. The Financial Identity Infrastructure™ Technology Stack

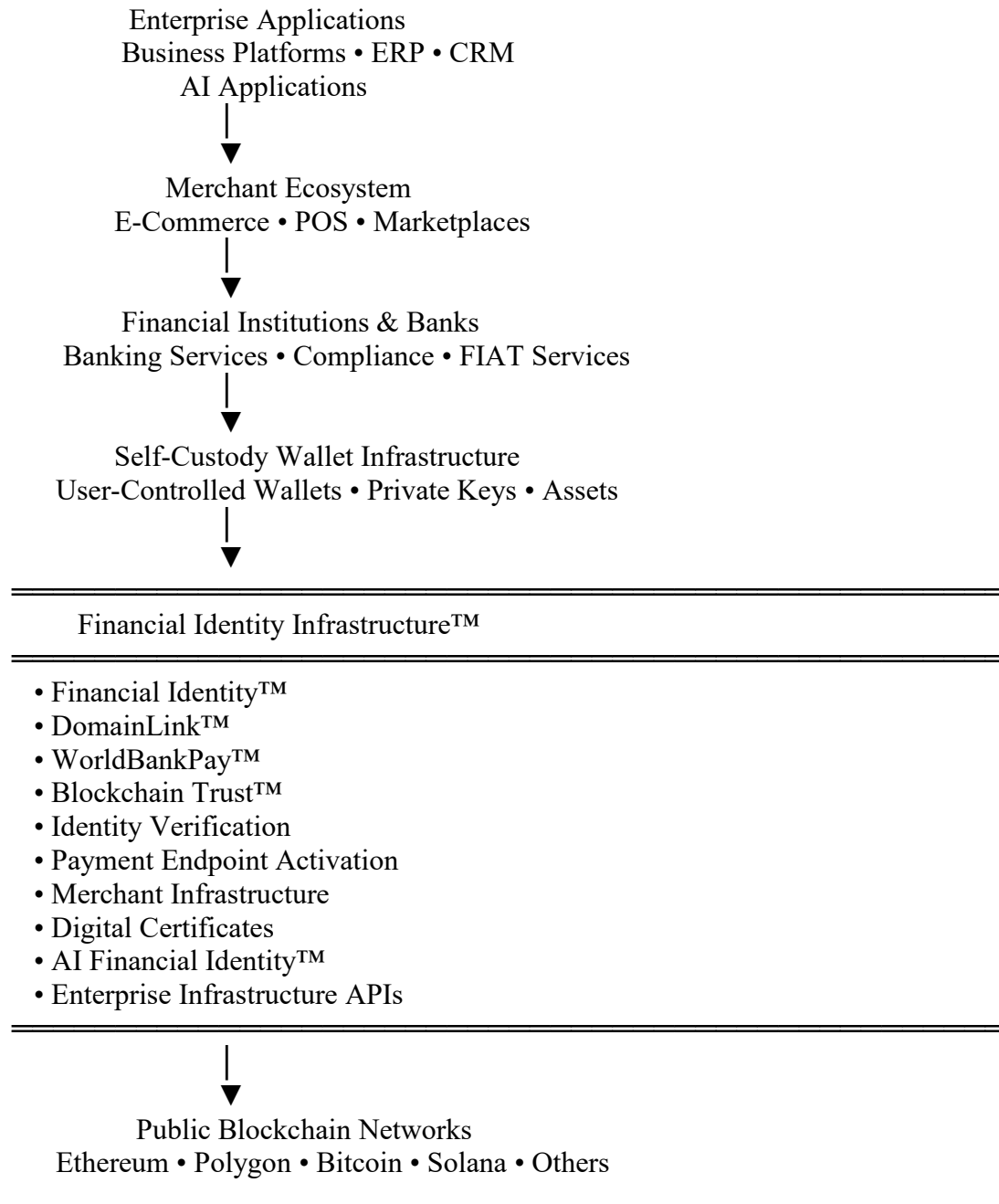
Financial Identity Infrastructure™ as the Foundational Layer

One of the most common misconceptions is that World Blockchain Bank™ operates as an end-user financial institution or payment provider.

In reality, **Financial Identity Infrastructure™ is a foundational technology layer** that sits beneath applications, merchants, financial institutions, wallets, and blockchain networks, enabling trusted identity, authentication, interoperability, and blockchain-native commerce.

Rather than replacing banks, wallets, or blockchain networks, World Blockchain Bank™ provides the identity infrastructure that allows these systems to interact through verifiable Financial Identities™, programmable payment endpoints, and trusted blockchain registrations.

The relationship can be illustrated as follows:



The Purpose of the Infrastructure Layer

Financial Identity Infrastructure™ functions as the **identity and interoperability layer** that connects participants to blockchain networks without assuming custody of customer assets.

Its primary responsibilities include:

- Establishing verifiable Financial Identities™
- Activating blockchain-native payment endpoints
- Registering blockchain identities and ownership records
- Providing trusted authentication services
- Enabling merchant onboarding and infrastructure
- Supporting enterprise integration through APIs
- Issuing blockchain-based digital certificates
- Providing AI-ready financial identity infrastructure
- Enabling trusted interactions across decentralized ecosystems

Importantly, **Financial Identity Infrastructure™** does not replace existing **blockchain networks, wallets, or financial institutions**. Instead, it enhances them by providing a standardized identity layer that allows participants to identify themselves, establish trust, authenticate ownership, and interact more efficiently across decentralized environments.

Why This Architecture Matters

Traditional financial systems were designed around **accounts**.

Blockchain networks were designed around **wallet addresses**.

The emerging AI economy requires something more fundamental:

Verified Financial Identities™.

Financial Identity Infrastructure™ provides that missing layer.

Rather than functioning as a bank, exchange, payment processor, or custodial wallet, World Blockchain Bank™ provides the foundational identity infrastructure upon which future financial applications, merchants, institutions, autonomous AI agents, and blockchain ecosystems can securely interact.

This architectural positioning is significant from both a technical and regulatory perspective because it distinguishes **identity infrastructure** from **financial intermediation**.

Accordingly, World Blockchain Bank™ should be understood as providing a **foundational technology layer** within the digital financial ecosystem, supporting identity, trust, interoperability, and blockchain-native commerce without taking possession of customer assets or participating as a custodial financial intermediary.

10. Financial Identity vs Financial Intermediation

Traditional financial institutions operate by becoming trusted intermediaries.

Financial Identity Infrastructure™ operates differently.

Instead of holding customer assets, it enables customers to interact directly with one another.

- Identity replaces intermediation.
- Verification replaces custody.
- Infrastructure replaces centralized control.

11. Comparison

Category	Holds Funds	Controls Private Keys	Processes Payments	Provides Identity
Bank	✓	N/A	✓	Limited
Payment Processor	Sometimes	No	✓	No
Crypto Exchange	Usually	Usually	✓	Limited
Custodial Wallet	✓	✓	Sometimes	No
MetaMask	No	No	No	Limited
World Blockchain Bank™	No	No	No (users transact directly)	Yes

12. The Financial Identity Layer

Every Financial Identity™ may include:

- Verified Identity
 - Payment Endpoint
 - Merchant Endpoint
 - Digital Business Card
 - Blockchain Trust™
 - Digital Certificates
 - AI Identity
 - Beneficiary Structure
 - RWA Registry
 - Blockchain Bonds
 - Programmable Relationships
-

13. Why This Matters for Regulators

Regulatory frameworks have historically focused on organizations that:

- Hold customer money.
- Transmit customer money.
- Exchange customer assets.
- Safeguard customer assets.

World Blockchain Bank™ was deliberately engineered to avoid centralized custody.

Accordingly, regulatory analysis should focus on the actual functions performed by the platform rather than assumptions based solely on industry terminology.

14. Benefits of the Model

- Reduced Custodial Risk
- Direct Settlement
- User Asset Control
- Lower Counterparty Risk
- Programmable Identity
- AI Commerce Ready
- Global Interoperability
- Identity-Based Commerce
- Lower Infrastructure Costs
- Scalable Enterprise Architecture

15. AI Commerce

As autonomous AI agents become economic participants, they require:

- Identity
- Authorization
- Verification
- Payment Endpoint
- Ownership
- Auditability
- Trust

Financial Identity Infrastructure™ provides this foundational layer without requiring centralized custody of agent assets.

16. Global Regulatory Perspective

Financial Identity Infrastructure™ should be evaluated based upon its actual technical architecture and operational model.

The relevant regulatory analysis should distinguish between:

- custody versus self-custody,
- financial intermediation versus software infrastructure,
- payment processing versus direct blockchain settlement,
- asset control versus identity services,
- centralized execution versus user-authorized blockchain transactions.

This functional analysis may assist regulators in determining the appropriate legal and supervisory framework applicable within their jurisdiction.

17. Selected Regulatory and Technical References

The purpose of this paper is to describe the technical architecture and operational model of World Blockchain Bank™ and its Financial Identity Infrastructure™.

The following international standards, regulatory frameworks, and technical guidance documents are acknowledged as important reference materials for understanding the broader regulatory environment in which blockchain infrastructure, digital identity, virtual assets, and financial technology operate.

This paper does not interpret or supersede any applicable laws or regulations. Regulatory treatment will depend upon the legislation, supervisory guidance, and factual circumstances applicable within each jurisdiction.

International Regulatory Frameworks

Financial Action Task Force (FATF)

The Financial Action Task Force (FATF) develops international standards relating to anti-money laundering (AML), counter-terrorist financing (CFT), and the regulation of Virtual Asset Service Providers (VASPs).

Relevant publications include:

- FATF Recommendations
- Guidance for a Risk-Based Approach to Virtual Assets and Virtual Asset Service Providers
- Interpretive Note to Recommendation 15

These publications establish internationally recognized principles for evaluating activities involving virtual assets and financial services.

Financial Crimes Enforcement Network (FinCEN)

The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) provides guidance relating to Money Services Businesses (MSBs), virtual currencies, anti-money laundering obligations, and related financial activities.

Relevant guidance includes interpretations concerning:

- Convertible Virtual Currency (CVC)
- Money Transmission
- Self-hosted Wallets
- Money Services Businesses (MSBs)
- AML Program Requirements

European Union — Markets in Crypto-Assets Regulation (MiCA)

The European Union's Markets in Crypto-Assets Regulation (MiCA) establishes a harmonized regulatory framework governing crypto-assets and crypto-asset service providers throughout the European Union.

MiCA provides an important reference for understanding regulatory approaches to:

- Crypto-Asset Service Providers (CASPs)
- Digital asset issuance
- Consumer protection
- Market integrity
- Prudential supervision

Republic of India

India's regulatory framework for Virtual Digital Assets (VDAs) includes legislation and guidance relating to:

- Prevention of Money Laundering Act (PMLA)
- Financial Intelligence Unit – India (FIU-IND)
- Virtual Digital Asset (VDA) reporting obligations
- Anti-money laundering and counter-terrorist financing compliance

These frameworks are relevant when evaluating activities involving digital assets within the Republic of India.

International Financial Services Centres Authority (IFSCA)

The International Financial Services Centres Authority (IFSCA) regulates financial activities conducted within India's International Financial Services Centre (IFSC), including GIFT City.

Relevant regulatory frameworks include:

- Banking
- Finance Companies
- Capital Market Intermediaries
- Fund Management
- FinTech Entities
- Ancillary Financial Services

These frameworks provide mechanisms through which innovative financial technologies may be evaluated within the IFSC ecosystem.

Digital Identity Standards

National Institute of Standards and Technology (NIST)

NIST publishes internationally respected guidance concerning digital identity management, authentication, cybersecurity, and identity assurance.

Relevant publications include:

- NIST Digital Identity Guidelines (SP 800-63 Series)
- Authentication Assurance Levels (AAL)
- Identity Assurance Levels (IAL)
- Federation Assurance Levels (FAL)

These publications provide widely adopted principles relating to secure digital identity systems.

Blockchain and Self-Custody Concepts

The non-custodial architecture described in this paper reflects established blockchain principles, including:

- User-controlled cryptographic key management
- Self-custody wallet architecture
- Peer-to-peer blockchain settlement
- Decentralized transaction authorization
- Public blockchain verification

- Cryptographic transaction signing

These concepts have become foundational design principles across decentralized blockchain ecosystems.

Functional Evaluation Principle

The regulatory classification of any technology platform should be based upon the **actual technical functions performed** rather than terminology, branding, or assumptions derived from legacy financial institution models.

Accordingly, Financial Identity Infrastructure™ should be evaluated based upon its operational characteristics, including:

- Identity services
- Authentication
- Blockchain registration
- Merchant infrastructure
- Payment endpoint activation
- Interoperability
- Enterprise integration
- Non-custodial architecture

rather than by analogy to organizations whose primary function is the custody, control, exchange, or transmission of customer assets.

Continuing Regulatory Engagement

World Blockchain Bank™ recognizes that digital asset regulation, digital identity standards, AI governance, and blockchain infrastructure continue to evolve globally.

Accordingly, Financial Identity Infrastructure™ is intended to operate within applicable legal and regulatory frameworks, and this position paper should be read as a description of the platform's technical architecture rather than as a legal opinion regarding the application of any specific law or regulation.

World Blockchain Bank™ welcomes constructive engagement with regulators, policymakers, standards organizations, financial institutions, and industry participants to advance the responsible development of non-custodial Financial Identity Infrastructure™ as a foundational component of the emerging digital economy.

18. Regulatory Perspective

The financial services industry has historically regulated institutions whose primary function is to accept deposits, custody assets, transmit money, process payments, exchange value, or otherwise act as trusted financial intermediaries.

World Blockchain Bank™ was intentionally designed around a fundamentally different architectural model.

Rather than acting as a custodian or intermediary, World Blockchain Bank™ provides **Financial Identity Infrastructure™**—a non-custodial technology layer that enables individuals, businesses, merchants, institutions, governments, and autonomous AI agents to establish verifiable financial identities capable of interacting directly with decentralized blockchain networks while retaining exclusive control over their own wallets, private keys, and digital assets.

Throughout this paper, we have demonstrated that World Blockchain Bank™:

- Does not accept customer deposits.
- Does not custody customer funds or digital assets.
- Does not control private keys.
- Does not create or manage customer wallets.
- Does not authorize or sign transactions on behalf of users.
- Does not execute, reverse, or control blockchain transactions.
- Does not become a counterparty to customer transactions.

Instead, the platform provides the foundational infrastructure necessary to establish trusted financial identities, activate blockchain-native payment endpoints, register blockchain assets, issue digital certificates, enable merchant infrastructure, and support secure interoperability across decentralized ecosystems.

Accordingly, **Financial Identity Infrastructure™** represents a distinct category of blockchain-native technology whose primary purpose is identity, authentication, trust, registration, and interoperability—not financial intermediation.

Functional Regulatory Principle

The appropriate regulatory analysis of any technology platform should be based upon the **actual technical and operational functions performed by that platform**, rather than assumptions derived from its branding, terminology, or comparisons with legacy financial institutions.

For World Blockchain Bank™, the relevant questions are therefore not:

- Is it called a bank?
- Does it resemble a payment company?
- Does it operate like a crypto exchange?
- Does it look similar to a wallet provider?

Rather, the appropriate questions are:

- Does the platform take custody of customer assets?
- Does it control customer private keys?
- Does it execute or authorize transactions?
- Does it receive or transmit customer funds as an intermediary?
- Does it become a counterparty to financial transactions?
- Or does it provide software infrastructure that enables users to interact directly while retaining exclusive control of their own assets?

The answers to these questions define the platform far more accurately than any traditional industry label.

Looking Forward

As digital identity, blockchain technology, tokenized assets, decentralized commerce, and autonomous AI systems continue to evolve, regulatory frameworks will increasingly encounter technologies that do not fit neatly within traditional classifications developed for centralized financial intermediaries.

Financial Identity Infrastructure™ represents one such emerging category.

Its purpose is not to replace regulated financial institutions, but to provide a trusted identity and interoperability layer that complements existing financial ecosystems while supporting the next generation of blockchain-native commerce.

World Blockchain Bank™ welcomes constructive engagement with regulators, policymakers, standards organizations, financial institutions, legal experts, and industry participants to advance a common understanding of non-custodial Financial Identity Infrastructure™ and its role within the future digital economy.

Final Statement

World Blockchain Bank™ should be evaluated based upon its actual technical architecture and operational functions rather than assumptions derived from legacy financial institution classifications.

The platform's architecture, functional separation, and non-custodial design demonstrate that its primary role is to provide **identity infrastructure rather than financial intermediation**.

As regulatory frameworks continue to evolve globally, we believe that evaluating technology according to its **actual operational characteristics**—rather than historical terminology—will promote greater legal clarity, encourage responsible innovation,

and support the development of secure, interoperable, and user-controlled financial infrastructure for the digital age.

Appendix A — Core Infrastructure Components

- Financial Identity Infrastructure™
- DomainLink™
- WorldBankPay™
- Blockchain Trust™
- WorldBankPay Signature™
- Enterprise Infrastructure Licensing™
- Commercial Stewardship™
- RWA Infrastructure
- Blockchain Bond Infrastructure
- AI Financial Identity Framework
- Merchant Infrastructure
- Digital Certificate Framework

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