

# Using EMLs as an Alternative to Traditional Banks

## Executive Summary

As the global financial landscape evolves, an increasing number of Electronic Money Institutions (EMIs) have positioned themselves to serve cryptocurrency-related businesses, such as exchanges, OTC desks, DeFi platforms, token issuers, and blockchain developers. However, most Tier 1 banks still avoid direct exposure to crypto, meaning the EMI's underlying correspondent bank relationships are critical to understanding their true risk posture and payment capabilities.

This guide lists crypto-accommodating EMIs and their correspondent banking setups, focusing on providers active in SEPA, SWIFT, and multi-currency settlements in 2025.

## Tier 1 Crypto-Friendly EMIs (2025)

### 1. Banking Circle (Luxembourg/UK)

- Focus: High-volume PSPs, crypto platforms with licensing and compliance documentation
- Strengths: SEPA, SWIFT, real-time FX, access to multiple currency corridors
- Crypto Stance: Permissive for EU-licensed or FATF-compliant crypto entities
- Correspondents: Barclays, SEB, BofA (client-dependent access)

### 2. ClearBank (UK)

- Focus: UK-based fintechs, neobanks, and regulated crypto exchanges
- Strengths: Access to Faster Payments, SEPA via partner rails
- Crypto Stance: Accepts licensed crypto clients with full transparency
- Correspondents: NatWest, Lloyds (indirect), BNY Mellon (for USD routing)

### 3. Paytend (Lithuania)

- Focus: Asian and EU crypto exchanges, OTC desks, NFT marketplaces
- Strengths: IBAN accounts, SEPA, card issuing, CNY/EUR corridors
- Crypto Stance: Supports crypto-aligned business models with internal risk scoring
- Correspondents: Indirect SEPA via Lithuanian clearinghouse; tier 2 correspondent banks

### 4. Mistertango (Lithuania)

- Focus: Retail crypto exchanges, wallet providers, and mining-related entities
- Strengths: Simple onboarding, EUR IBANs, open to high-risk verticals
- Crypto Stance: Crypto-friendly, but requires source of funds/wealth
- Correspondents: Local SEPA rails, indirect SWIFT partners

### 5. Bankera (Lithuania)

- Focus: Token sale vehicles, DeFi startups, payment processing for exchanges
- Strengths: Wallet integration, crypto-to-fiat conversion rails, debit card issuing
- Crypto Stance: Built by crypto-native founders; accepts most legal crypto models
- Correspondents: Private Baltic banks and indirect SWIFT facilitators

## 6. GlobalNetint / Walletto / Finolita (Lithuania - High Risk Tier)

- Focus: Forex, crypto, gambling crossovers
- Strengths: Basic IBANs, card issuing, low onboarding thresholds
- Crypto Stance: Permissive but under regulatory scrutiny; volatile partnerships
- Correspondents: Often limited to intra-EMI transfers or tier 2 rails

## 7. Revolut Business (UK + EEA)

- Focus: Tech-forward businesses, limited exposure to direct crypto activity
- Strengths: Multi-currency accounts, API integrations, corporate cards
- Crypto Stance: Permits businesses with passive crypto exposure; no exchanges or token sales
- Correspondents: JP Morgan (USD), Lloyds (GBP), SEB (EUR), others

## Important Considerations

- Client Type Matters: EMIs may accept crypto-related business models only if structured under regulated VASP licenses, EU-registered entities, or with third-party compliance attestations.
- Indirect Correspondence: Many EMIs use aggregator banks or pooled clearing solutions. This limits their ability to handle complex or large-volume transfers outside EUR/SEPA corridors.
- Risk of De-banking: Crypto-friendly EMIs are periodically cut off from their bank partners. Businesses must maintain redundant EMI accounts and daily reconciliation practices.

## Best Practice for Crypto Businesses

1. Do not rely on a single EMI. Use 2–3 institutions to diversify risk and avoid service interruptions.
2. Prepare a clean compliance file (license, KYC, source of funds, business model overview) before applying.
3. Avoid shell ownership structures or offshore jurisdictions on EU blacklists.
4. Maintain fiat buffers in stable correspondent channels (e.g., UK or EEA-regulated EMI accounts).
5. Monitor EMI regulatory health — review license status, public complaints, and correspondent bank notices regularly.

## Final Notes

Crypto banking remains volatile in 2025. While EMIs offer flexibility and accessibility, they come with regulatory fragility and operational limits. Clients must pair EMI usage with structured compliance, jurisdictional planning, and real-time monitoring of both counterparties and correspondent rails.