

Fintech Licensing by Jurisdiction — At-a-Glance Matrix

A Strategic Overview for Cross-Border Fintechs, EMIs, PSPs & Payment Platforms

Prepared by HPT Group

In-house Counsel Commentary | Offshore & Regulatory Advisory

Executive Summary

In today's fintech landscape, licensing is not just about compliance — it is a strategic decision. Jurisdictional arbitrage offers founders and investors the ability to reduce regulatory burden, optimize taxation, access tiered financial systems, and position themselves for international growth. Whether you are launching an EMI, MSB, PSP, or crypto payment platform, the jurisdiction you choose will directly influence your capital requirements, client onboarding capabilities, tax exposure, and investor perception.

This at-a-glance matrix is tailored for HNWI's, digital entrepreneurs, and fintech advisors evaluating offshore and onshore licensing hubs, comparing their regulatory complexity, licensing timeframes, tax treatment, passporting potential, and reputation.

HPT works with a global network of lawyers, agents, and compliance teams to structure fintech ventures legally, efficiently, and with full adherence to international financial standards (FATF, AMLD6, PSD2, etc.).

Key Offshore Benefits for Fintechs

- **Asset Protection:** Using holding companies or trusts in Nevis, BVI, or Cook Islands to shield platform revenues and IP.
- **Regulatory Arbitrage:** Leveraging Mauritius, Seychelles, or DIFC to avoid burdensome EU-style licensing but still access USD/EUR IBANs.
- **Optimized Taxation:** Zero or low corporate tax on retained profits via tax-transparent structures (e.g., Irish LPs, UAE Free Zones).
- **Cross-Border Banking Access:** Fintechs using EMI licenses in Lithuania or MSBs in Canada often route flows via Swiss, Liechtenstein, or UAE banks.
- **Low Substance Burden:** Some jurisdictions allow initial license approvals with limited physical presence (staff, office, director).

Fintech Licensing Matrix by Jurisdiction (2025)

Jurisdiction	License Types	Tax Rate	Substance Required	Processing Time	Key Advantages
Lithuania (EU)	EMI, PI, AISP	15%	Medium (2 FTE, office)	4–6 months	EU passporting, strong regulator, access to SEPA
UK	EMI, PI, AISP	25%	High (full staff & ops)	6–9 months	FCA credibility, GBP accounts, investment-
Mauritius	PSP, EMI	15%	Low–Medium (local rep)	3–4 months	Gateway to Africa/Asia, tax treaties, English
UAE (DIFC/ADGM)	EMI, MSB, Money Services	0%	High (local office, staff, CEO)	3–6 months	Regulatory certainty, 0% tax, USD accounts
BVI	Holding Entity only	0%	Low (virtual office)	1–2 weeks	Tax-exempt, anonymous holding for
Singapore	EMI, Major Payment Institution	17%	High (local director, audit)	6–9 months	Global banking hub, strong treaties, investor
Canada	MSB (FINTRAC)	~27% corp tax	Low (local compliance officer)	2–3 months	Access to North American banking, fast
Estonia	VASP, PSP	20% (on dist.)	Medium (local AML officer)	2–3 months	Crypto-friendly, fast incorporation
Ireland	PI, EMI	12.50%	High (Substance required)	5–7 months	EU access, strong compliance image
Seychelles	PSP (unregulated use)	0%	Minimal	1 week	Offshore PSP setup, often used as tech layer

Additional Notes for 2025:

- MiCA Regulation (EU) will apply to crypto asset services starting in full from January 2025. VASPs must now adopt formal compliance architecture in all EU member states.
- UK is no longer part of the EU passporting regime. UK EMI licenses are limited to domestic use unless additional licenses are obtained in EU zones.
- DIFC/ADGM continues to be the fastest-growing regulatory environment for fintech holding companies, thanks to favorable IP protection laws, 100% foreign ownership, and Tier-1 banking access.

- BVI, Belize, Nevis are used for layered ownership, holding IP, tokenization frameworks, and cash reserves —but not to operate payment flow or offer services directly to clients.
- Swiss and Liechtenstein fintech licenses (not in this matrix) offer private banking access but at high cost and capital requirements (CHF 300K–500K+).

Conclusion: Structure Determines Scale

Your choice of jurisdiction determines your future fundraising, partnerships, banking access, and exit strategy. HPT Group provides full-spectrum structuring for fintechs — from sandbox environments to fully licensed operations — through our global partner network.

We advise founders, investors, and legal counsels on:

- Pre-licensing strategy and compliance
- Holding company setup in tax-neutral jurisdictions
- End-to-end EMI/PSP application support
- Regulatory opinions for cross-border business models

HPT. Your Offshore Advantage in Fintech.