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Multi-Currency Wallets: what came first ... the wallet or the license?

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For remittance providers, the answer is rarely straightforward. A multi-currency wallet may seem like a product feature: a convenient way for users to hold GBP, send USD and cash out in local currency via mobile money. But regulators do not see it as just a feature, they see it as core infrastructure, one with major implications for Fx handling, exchange controls and reporting obligations.

🚩 This **tension** sits at the heart of today's remittance expansion strategies. Build too fast without regulatory alignment, and your wallet may be flagged for post-license review. Wait too long to develop the product, and you miss the agility needed to lead in high-volume corridors.

At **#MDBLaw**, we help remittance operators resolve this tension by formulating your wallet functionality and remittance strategy within the four corners of our laws and licensing requirements.

🌐 Why Your Wallet Strategy Matters Now

Mobile multi-currency wallets are becoming the foundational component of modern remittance infrastructure. However, enabling this functionality requires far more than technical integration. It demands close alignment between legal and technical mandates, foreign exchange execution, user safeguards to prevent Fx speculation and well-documented outbound remittance agreements to pass regulatory scrutiny.

Global trends are shifting fast. The global mobile wallet market is projected to reach US\$71 billion by 2031, driven largely by demand for multi-currency support, faster transfers and improved user experience.

White-label wallet platforms like **#Youtap** now integrate seamlessly with remittance providers, enabling wallet-to-wallet or wallet-to-bank disbursements and significantly accelerating time-to-market.🔥

🔍 What You Need to Get Right—From Day One

If your remittance model includes multi-currency wallet capability, outbound mobile money disbursements or internal Fx conversion, it cannot be bolted on after licensing. You will need to answer key questions before you even submit your application ...

In South Africa, this means understanding whether your wallet can be included in your initial remittance license application or whether it will be flagged as an enhancement, requiring a separate post-approval submission.

 **We help remittance providers navigate the questions that regulators are already asking:**

➡ **Is your FX execution strategy tightly defined?** That includes how funds are held, when conversion happens and how you prevent speculative behaviour?

➡ **Is your user model compliant with local KYC/AML expectations?** You must show who can access your wallet, under what conditions and how controls are applied?

➡ **Are third-party mobile money operators part of your payout network?** Only ADLA Category II license holders are allowed to partner with external MTOs under South African regulation.

➡ **Are your wallet flows clearly documented in your technical manuals, governance frameworks and customer terms?** If they are not, your product may be delayed or be rejected as incomplete.

What MDB Law Brings to Your Wallet Strategy

We work closely with remittance operators to ensure that wallet functionality is fully integrated into your licensing narrative and legal documents from the outset. That includes defining wallet features in language that aligns with FinSurv guidelines, building documentation to support multi-currency logic and by ensuring your Fx models are ready for testing by the regulators.

If wallet features need to be submitted as an enhancement, we help you stage that process without disrupting your go-to-market timeline.

The Bottom Line: Your Wallet Is Infrastructure

A multi-currency wallet can give you a serious market edge: faster transfers, Fx flexibility and corridor-specific pricing. But only if it is structured correctly from day one. If your growth strategy includes wallet-based infrastructure, MDB Law is the partner to help you build it with legal and regulatory precision.

#MDBLaw #MultiCurrencyWallets #RemittanceLicensing #FinSurv
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