KOWO

Compliance & Regulatory Pack

Building the future of community finance across Africa and its diaspora.

Version 1.0 • Confidential • 2026

Core statement

KOWO is a technology platform. It does not act as a bank, PSP, EMI, SGI, broker or asset manager. Regulated services are performed by licensed partners.

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Document map

A concise regulatory view of KOWO: current activity, future roadmap, financial flows, third parties, controls and partner responsibilities.

KOWO in one page

A pan-African technology platform for organising community savings, contributions and future partner-led access to investment services.

What KOWO does today

Organises digital community savings, rotational contributions, projects and group tracking through a mobile-first experience.

How payments are handled

Payment processing is intended to be performed by licensed PSPs / payment partners. KOWO does not operate as a regulated payment institution.

How KOWO evolves

Future investment features will be activated only through SGIs, banks, brokers or other duly licensed financial partners.

1%
target commission on community savings

3%
target commission on clubs / projects

0
funds held by KOWO for its own account

2026
Android + Benin entity + PSP onboarding

Community finance is already massive. The tools are not.

Across Africa and its diaspora, groups already save, rotate contributions and finance projects together. The process is often manual, fragmented and hard to prove.

WhatsApp groups → Excel / notebooks → Cash & Mobile Money → Manual tracking → Disputes & opacity

KOWO replaces fragmented coordination with one trusted operational layer: group rules, member tracking, contribution history, reminders and partner-operated payments.

From informal savings to trusted digital infrastructure

KOWO aims to become the reference community finance layer connecting Africa and its diaspora.

Today

Digital savings, rotational contributions, group tracking and projects.

01

Next

Mobile Money, cards, KYC, reporting and trusted community operations.

02

Tomorrow

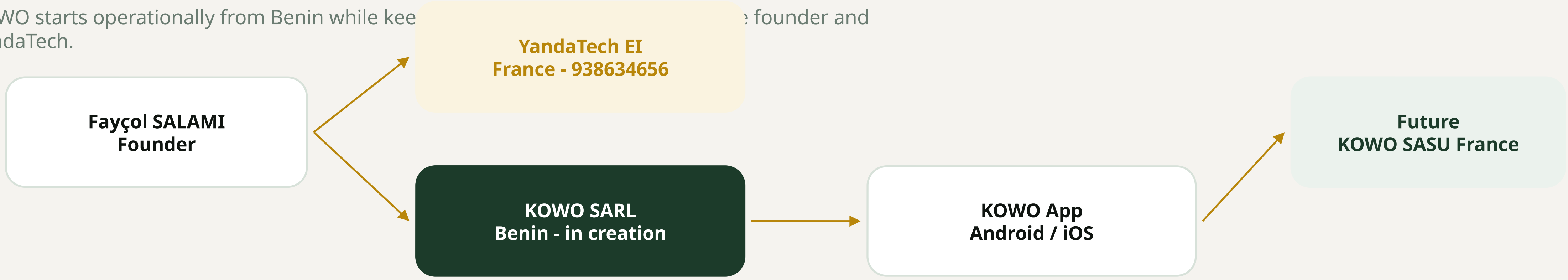
Investment access through SGIs, banks, brokers and licensed financial partners.

03

Strategic ambition: a pan-African financial community platform, not a single-country tontine app.

Current entity and long-term path

KOWO starts operationally from Benin while kee … founder and YandaTech.



Founder credibility

Fayçol SALAMI is also the founder of YandaTech EI in France and leads KOWO with a cybersecurity / GRC background.

European expansion optionality

A future KOWO SASU in France may support Europe, PSPs, French Tech, Bpifrance and diaspora partnerships.

Fayçol SALAMI

Founder of KOWO SARL and YandaTech EI. Cybersecurity, GRC and digital product builder.

FS

Founder & Product Lead

- Founder - KOWO SARL (Benin)
- Founder - YandaTech EI (France)
- Cybersecurity / GRC profile
- Service Delivery & IT resilience background
- MBA Cybersecurity & Blockchain
- Focus: trust, security, compliance

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What KOWO does today

The current perimeter is operationally focused on digital organisation, transparency, community management and future partner-operated payments.

Savings groups

Rules, members, rotation order, reminders and contribution history.

Projects

Community projects and collaborative funding visibility.

Simulation

BRVM / NGX style education and simulation without real investment execution.

Clubs

Community coordination and future partner-led investment access.

Traceability

A digital history that improves transparency between members.

Mobile first

Android live. iOS planned. Diaspora accessible through supported payment rails.

From Africa launch to diaspora infrastructure

A staged deployment that separates current non-regulated software services from future regulated partner-led services.

2026 H1 — KOWO SARL Benin, Android live, PSP onboarding, compliance pack

2026 H2 — FeexPay / mobile money flows, first active groups, App Store path

2027 — Diaspora pilots, KOWO France option, European PSP discussions

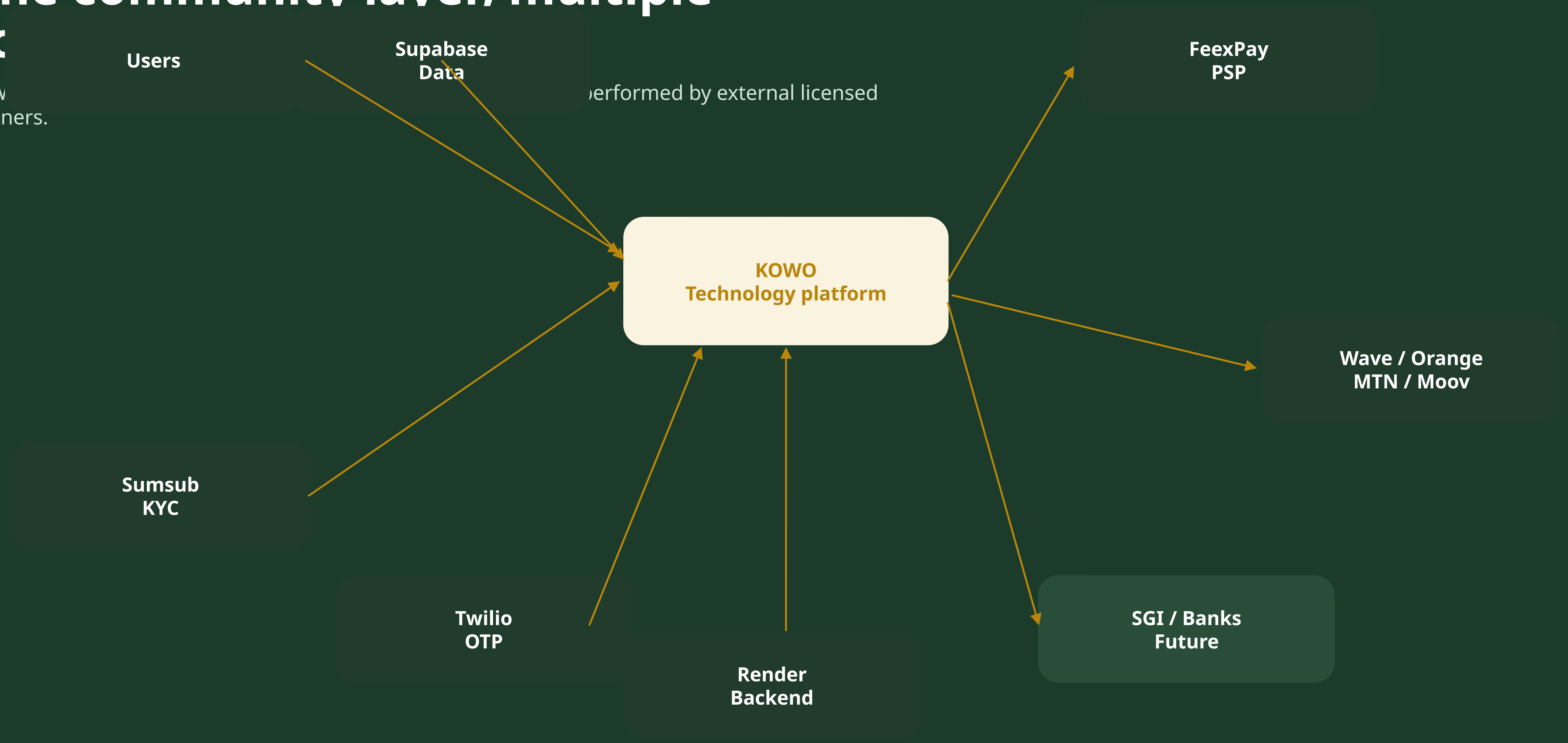
2028+ — SGI / BRVM integrations, pan-African expansion, advanced reporting

Roadmap principle

Real investment features will not be activated until a duly licensed SGI, broker, bank or financial partner is contractually and operationally integrated.

One community layer, multiple lic

KOW …erformed by external licensed partners.



Operational stack and third-party providers

KOWO is designed as a modern cloud-native mobile platform with specialised providers for data, backend, hosting, KYC and messaging.

Mobile App

Expo / React Native
Android live
iOS planned

Backend

Render
API services
Business logic

Database

Supabase
PostgreSQL
Auth / storage

Messaging

Twilio
OTP / notifications

KYC

Sumsub
Identity checks

Website

GitHub Pages
Domain: IONOS

Principle: KOWO keeps the product layer modular so regulated components can be delegated to licensed providers without rewriting the platform.

Current and planned operational partners

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Provider	Role	Responsibility
Supabase	Database / storage / auth	Technology infrastructure
Render	Backend hosting	Technology infrastructure
GitHub Pages	Website hosting	Public website
IONOS	Domain / DNS	Domain management
Sumsub	KYC verification	Identity verification provider
Twilio	OTP messaging	Messaging provider
FeexPay	Payments / mobile money	PSP / payment partner

Direct partner-operated payment flow

The preferred model is a direct payment flow where the PSP / payment partner controls the payment rail and KOWO operates the experience layer.

User → KOWO app layer → Payment partner → Mobile Money / card rail → Beneficiary

KOWO plans, records, notifies and displays status. The payment partner executes payment processing and regulated payment services.

Key compliance point

KOWO is not the holder of user funds for its own account and does not present itself as a licensed payment institution.

Where FeexPay may require additional review

If funds are temporarily visible in a KOWO merchant environment before payout, the model requires stronger contractual and operational clarity.

User → FeexPay merchant account → KOWO triggers payout → Beneficiary

Compliance sensitivity

The PSP may ask whether KOWO controls allocation, timing, beneficiaries or pooled funds.

Required answer

KOWO must document that operations are user-authorised and processed by licensed payment partners.

Recommended next step

Confirm the exact FeexPay settlement model: direct payout, wallet, merchant balance, sub-account or escrow-like flow.

Who does what

The compliance story depends on a clean separation between product orchestration, identity
ch

Users
Create groups, define rules, authorise contributions, receive funds.

KOWO
Software layer: rules, tracking, reminders, dashboards, history, support.

Sumsub
Identity verification and KYC tooling.

FeexPay / PSP
Payment acceptance, processing, settlement and payout rails.

Mobile Money / Banks
Underlying accounts and payment instruments.

KOWO is a technology platform

This page is the reference statement for PSPs, banks and partners.

KOWO IS

- ✓ Software company
- ✓ Technology provider
- ✓ Community platform
- ✓ UX orchestration layer
- ✓ Data & reporting interface

KOWO IS NOT

- × Bank
- × Payment institution
- × E-money institution
- × SGI / broker
- × Asset manager

Operating principle

Any regulated payment, investment, asset distribution or financial service must be executed by duly licensed partners. KOWO remains the product and technology layer.

Current activity vs. future regulated services

A clear boundary protects KOWO, users and partners.

Current active perimeter

Community savings organisation, rotational contributions, project tracking, education, simulation and app experience.

Not active today

Real securities trading, order execution, asset distribution, fund management, investment advice or banking services.

Future only via partners

SGI, brokers, banks, PSPs or licensed institutions will perform any regulated service when activated.

No real investment feature should be marketed as available until a licensed partner and a compliance operating model are approved.

Identity verification strategy

KOWO uses a specialised provider for KYC workflows while keeping the product experience simple and mobile-first.

User registration → OTP Twilio → KYC Sumsub → KOWO account

KYC provider

Sumsub is intended to support identity verification and onboarding controls.

OTP provider

Twilio supports OTP messaging and phone verification flows.

Risk policy

KOWO can define thresholds and enhanced checks before enabling sensitive functions.

Controls to implement before payment launch

The AML operating model should be documented with the PSP and aligned with the exact flow selected.

Customer screening

KYC / sanctions / PEP checks through dedicated providers and PSP requirements.

Transaction monitoring

Limits, velocity checks, unusual amounts, repeated failures, suspicious patterns.

Group risk review

Higher scrutiny for large groups, cross-border funding or high-value rotations.

Incident escalation

Clear process to freeze functionality, request evidence or notify PSP compliance.

Key dependency

The final AML responsibilities must be confirmed with the payment partner based on the settlement and payout model used.

Privacy and data governance approach

KOWO handles sensitive community and identity-related information. The approach should be privacy-by-design.

Data hosting

Supabase database infrastructure.

Backend

Render application backend and API layer.

Legal basis

Account management, service delivery, security, fraud prevention and contractual obligations.

Retention

Define retention periods for account, transaction history, KYC metadata and support requests.

User rights

Access, correction, deletion, portability and objection where applicable.

Cross-border

Document provider locations and data transfer safeguards.

Security is part of the product promise

KOWO must be perceived as a trust infrastructure, not only a savings app.

Authentication & OTP	KYC checks	Encryption in transit
Role-based access	Audit logs	Secure SDLC
Backups	Monitoring	Incident response

Founder advantage

The founder's cybersecurity / GRC background should be explicitly leveraged in partner discussions: risk thinking, ISO 27001 awareness, resilience and data protection discipline.

Digital history as a compliance asset

KOWO's value is not only payment enablement. It improves visibility and proof across community finance workflows.

Group created → Rules validated → Members invited → Contributions due → Payment status → Rotation completed → History exported

Operational benefit

A structured digital history can reduce disputes, improve user trust, support customer service and help partners understand the origin and purpose of payments.

Key risks and mitigation roadmap

Risk	Level	Mitigation
Regulatory misclassification	High	Clear perimeter, partner-led regulated services, compliance pack.
Funds flow ambiguity	High	Document exact PSP settlement model and payout responsibility.
Fraud / fake identity	High	Sumsub KYC, OTP, suspicious activity monitoring.
Disputes between members	Medium	Rules, history, logs, exportable evidence.
Data breach	High	Access controls, encryption, monitoring, backups.
Operational outage	Medium	Cloud monitoring, incident response, provider status checks.

Controls before, during and after payment launch

The objective is to move from MVP controls to partner-grade controls.

Before launch

Finalize PSP flow memo
KYC policy
Terms / privacy / compliance pages
Incident process

Payment launch

Transaction limits
Payout validation
Support escalation
Monitoring dashboard

Scale phase

AML rules
Risk scoring
Automated alerts
Periodic partner review

Investment phase

SGI contracts
Suitability scope
No advice disclaimer
Regulated partner execution

One community, multiple payment rails

A diaspora user can participate as long as the supported payment rail or receiving instrument is compatible with the group flow.

Wave	Orange Money	MTN MoMo	Moov Money
Airtel Money	Cards	Bank transfer	Future SEPA

Africa-first launch

KOWO SARL can start with African payment rails and Mobile Money ecosystems where community finance is already culturally understood.

Diaspora-ready ambition

The diaspora can participate in FCFA-based groups today through supported rails, while EUR / SEPA requires a future European PSP model.

SGI-led, partner-operated investment access

Investment features are part of the long-term roadmap and require licensed partners before activation.

User → KOWO interface → SGI / broker licensed partner → Market BRVM → Reports

Boundary statement

KOWO will not execute investment orders, manage portfolios or provide investment advice. Any real investment activity will be executed by a duly licensed financial partner.

Answers partners will expect

Does KOWO hold funds?

No for its own account. Funds should remain processed and settled through the payment partner model.

Who executes payments?

The PSP / payment partner executes payment processing, settlement and payout rails.

Does KOWO provide investment services?

No. Real investment features are future-only and partner-led.

Is KOWO a PSP or bank?

No. KOWO is a software and technology platform.

Who performs KYC?

KYC is planned through Sumsub and/or the PSP requirements.

What is needed from FeexPay?

A clear accepted flow: direct payout, merchant balance, sub-accounts or another compliant structure.

What KOWO needs from a PSP

Rather than a generic merchant account, KOWO needs a documented operating model aligned
wit

- **Confirm eligible activity perimeter**
- **Confirm settlement model**
- **Confirm payout rules**
- **Confirm KYC / AML responsibilities**
- **Confirm countries and payment methods**
- **Confirm prohibited use cases**
- **Confirm reporting requirements**
- **Confirm contractual language**

Ideal output: a written PSP-approved flow memo describing who holds funds, who can trigger payouts, who is liable and what controls apply.

A living compliance data room

KOWO should keep a structured data room to answer partner questions quickly and consistently.

Company documents

RCCM, IFU, statutes, ownership, bank account, domain ownership.

Product documentation

Features, screenshots, roadmap, user journeys, group rules.

Compliance docs

This pack, financial flow memo, KYC policy, AML controls, risk register.

Legal pages

CGU, privacy, legal notices, compliance page, disclaimers.

Technical docs

Architecture, providers, backups, security controls, incident response.

Partner docs

PSP questionnaires, contracts, SGI agreements, integration documents.

Public trust layer

The site should clearly explain KOWO's status, providers and financial flow.

Visible public claims

KOWO is a technology platform. Payments are partner-operated. Investment features are future partner-led.

Provider transparency

Supabase, Render, GitHub Pages, IONOS, Sumsub, Twilio and FeexPay should be listed clearly.

Partner-grade version

A deeper compliance pack is available for PSPs, banks, SGIs, investors and regulators.

Recommended URL: getkowo.com/legal/compliance-pack.html

Turn ambiguity into a structured PSP file

The fastest path is not to argue regulation by email, but to document the exact operating model and ask PSPs to validate it.

Week 1

Finalize KOWO SARL documents and this compliance pack.

Week 2

Write the FeexPay flow memo with exact settlement / payout model.

Week 3

Update website compliance page, CGU and privacy with KOWO SARL details.

Week 4

Re-submit to FeexPay + parallel outreach to other PSPs with the same pack.

KOWO

Our ambition is simple.

Become the trusted community finance infrastructure connecting Africa and its diaspora.

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