

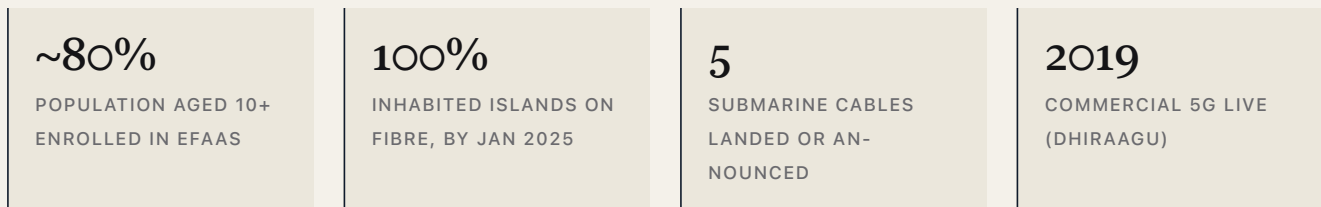
A digital archipelago and the substrate for sovereign automation.

A two-page reading of the national-identity, verifiable-credential, sovereign-compute, and connectivity record in 2026 and where the Maldives' digital substrate sits relative to it. Notes from the Boli Working Paper of May 2026.

Boli Association · Zurich
Observer notes

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The question every government is now being asked is the same — how much of what the state already does can be automated, on infrastructure the state controls, under audit trails the state can verify, without ceding the inference layer to a small set of foreign providers. The standards bodies have, through 2024–2026, converged on an answer: probabilistic models upstream, deterministic rule-based authorisation beneath them, irrevocable settlement beneath both, with provider concentration named as a systemic concern. The Maldives sits adjacent to that convergence with the strongest documented digital-government substrate in the SIDS group. What follows is a reading of the record, not a recommendation.



THE MALDIVIAN DIGITAL SUBSTRATE

eFaas — operated by the National Centre for Information Technology — enrolls approximately two hundred and seventy-two thousand individuals, roughly eighty per cent of the population aged ten and above, on late-2025 reporting. The OneGov platform aggregates services under eFaas. A Smart-ID card with integrated Mastercard payment rails is scheduled for 2026 rollout under the October 2025 Digital Country Partnership memorandum. Favara — built by **Tietoevry**, ISO 20022 — carries more than eighty-four per cent of retail transactions on MMA reporting, with UPI integration for cross-border P2P from July 2026.

The eFaas platform uses facial-recognition biometrics and a centralised registry — not a verifiable-credential wallet pattern. W3C Verifiable Credentials Data Model 2.0 conformance (Recommendation, fifteenth of May 2025) and eIDAS 2.0 mutual recognition are greenfield integration work, not off-the-shelf capability.

THE STANDARDS CONSENSUS ON AI IN REGULATED WORKFLOWS

- IMF NOTE 2026/004, 22 APRIL 2026
 - three-layer composition; agentic AI sanctioned only in Layer 1 (orchestration); Layer 2 is "strictly rules-based authorisation"; Layer 3 carries "irrevocable legal finality" and probabilistic systems are explicitly flagged as inappropriate.
- BIS 2025 AER CH. III
 - AI as "co-pilot" outside the settlement primitive; programmability in the ledger, intelligence above it.
- IOSCO CR/01/2025
 - six-measure framework: oversight, testing, expertise, third-party management, disclosure, data controls.
- FSB NOV 2024
 - third-party dependency, market correlation, cyber risk, model risk as systemic vulnerabilities.

STANDARDS WORK IN MOTION

Google's Agent Payments Protocol launched on the sixteenth of September 2025 with sixty-plus partners and was donated to the FIDO Alliance on the twenty-eighth of April 2026. Mastercard contributed Verifiable Intent to the same FIDO process. Coinbase's x402 had processed approximately 119M transactions on Base and 35M on Solana by Q1 2026, with ~\$600M in annualised volume. The W3C Agent Identity Registry Protocol Community Group was established in April 2026; the Decentralised Identity Foundation received the Model Context Protocol Identity donation in March 2026. Standardisation is in progress; the patterns are established.

THE CONNECTIVITY RECORD

Nationwide fibre-to-the-home completed by January 2025 — the first such network in the archipelago, on a ~1,250 km domestic backbone with Asian Development Bank co-financing. Four submarine cables landed (Maldives-Sri Lanka, SEA-ME-WE-6, PEACE, IAX) and a fifth — the **Google Dhivaru** cable, Maldives-Christmas Island-Oman with a new Addu City hub — announced in November 2025 with Ooredoo, Dhiraagu, and the Government of Maldives. Commercial 5G live since 2019 (Dhiraagu) and December 2020 (Ooredoo). Starlink licensed from August 2023 — the first such licence in South Asia. MVIX carrier-neutral exchange operational since late 2021. UN E-Government Survey 2024 places the Maldives ninety-fourth globally, the highest in South Asia.

An archipelago of approximately 1,192 coral islands across 26 geographic atolls, administered through nodes that are spatially separated, jurisdictionally bounded, individually accountable, and required to compose without consolidating onto a single ledger, is — in physical and administrative form — already operating the architectural pattern that distributed-settlement networks formalise in code.

THE PROVIDER-CONCENTRATION QUESTION

When a state runs sanctions-screening, tax-return processing, customs classification, benefits eligibility, or anti-money-laundering inference against a model, the call typically routes to one of a small number of foreign-hosted endpoints. The standard agentic-payments pipelines composing through 2025–2026 — Agent Payments Protocol, Mastercard Agent Pay, Visa Intelligent Commerce — share that property. Trusted Execution Environment attestation (Intel TDX + NVIDIA H100/H200, AMD SEV-SNP, AWS Nitro, GCP Confidential Space) closes the integrity question — proving the claimed code ran on the claimed inputs — but does not close the concentration question. This is the systemic concern the FSB has repeatedly named.

SOVEREIGN COMPUTE AS A PATTERN

Decentralised-compute marketplaces — open-source protocols in which workloads discover and pay for inference and training directly within the network, with TEE attestation supported across an open provider population — are one architectural response to the concentration concern on the public record. The Tenzro Network is the example the full paper describes. Air-gapped model deployment on the same protocol surface — model and inference inside a closed compute boundary, with the attestation pipeline still proving what code ran on what input — keeps regulated-entity inference inside a Maldivian or trusted-jurisdiction footprint with verifiability to the supervisor and no data exfiltration to a foreign-jurisdiction hyperscaler.

THE MALDIVIAN PRIVACY AND DATA REGIME

The operative regime is the 2017 Data Protection Act plus the direction of travel in the Privacy and Personal Data Protection Bill, drafted 2023 and in active legislative process through 2025 — the Bill creates a dedicated data-protection authority and is GDPR-aligned, but had not been enacted as of the eleventh of May 2026. Canton's sub-transaction privacy model — stakeholder-scoped views computed by the Daml engine, Global Synchronizer ordering encrypted messages without decrypting them — keeps contract content inside participant nodes the supervisor controls. Verifiable-credential selective disclosure under W3C VCDM 2.0 and SD-JWT VC keeps personal data inside the holder's wallet.

A COMPARATOR ALREADY RUNNING

The Trump Organization's Trump International Hotel Maldives, announced 17 November 2025 in partnership with Dar Global as a ~\$300M branded resort development, is the most publicly visible foreign-capital tourism engagement of the current cycle. Separately, on 18 February 2026, Dar Global — with World Liberty Financial and Securitize — announced a tokenisation programme on the Morpho protocol on Base Ethereum Layer 2, structured for Rule 506(c) and Regulation S distribution. Digital-asset activity interacting with the Maldives' surface is happening on architectural planes the Maldivian state has, on the public record, no supervisory grip on.

THE STATE-OF-THE-RECORD

By mid-2026 the standards bodies have settled on a three-layer composition for AI in regulated workflows and have named provider concentration as a systemic concern. Sovereign-compute patterns are documented; supervisory recognition of Canton-class settlement designs is in formation, not settled.

THE MALDIVIAN POSITION

Highest-enrolment national identity in the SIDS group; nationwide fibre; four submarine cables landed and a fifth announced; 5G since 2019; Starlink since 2023; UN E-Gov 94th globally. Verifiable-credential conformance and eIDAS 2.0 mutual recognition remain greenfield work.

NOTES FROM AN OBSERVER

These are observer notes from the Boli Association, not a recommendation. The Maldives' counterparties, supervisory authorities, and operational partners are better placed than any external observer to read what the record means for the jurisdiction's own configuration.