

SATIS OMNIBUS

Enough for All

*NZNB Strategic Proposal & NZLIX Progress Report — Honest
Edition (v8)*

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SATIS OMNIBUS — "Enough for All"

NZNB Strategic Proposal & NZLIX Progress Report — Honest Edition (v8)

Prepared for: the New Zealand Government and the Reserve Bank of New Zealand

Date: August 2026 · **Author:** Matthew Berry · **Classification:** Public vision & discussion edition

Live system: satisomnibus.com — deployed and operational

About this edition. This version replaces earlier, more optimistic figures with the conservative, **live-validated** numbers, and re-states the product as strictly **spot-only** (no leverage, margin, shorting, derivatives or futures). Where the earlier draft leaned on projected trading returns, this one follows the discipline of New Zealand's own "Enough for All — Growth & Fiscal-Capacity Report": *a fund is a store and a stabiliser, not the engine of prosperity*. This document is **not financial advice**; projections are backtest-derived and do not indicate future results. Verify all figures against the live site before relying on them.

Executive Summary

Satis Omnibus ("Enough for All") is a **fully operational, deployed trading platform**, not a concept paper. It presents a **dual-path** idea for New Zealand:

- **Institutional path (NZNB / strategic reserve):** a disciplined, Norway-style sovereign saving vehicle — Santiago-Principles governance, funded from genuine surplus, broadly diversified, spending only its sustainable real return.
- **Decentralised path (Satis app):** software that lets individuals run a transparent **spot-only** strategy on **their own** regulated broker accounts — no intermediary, and the platform never custodies client funds.

The product, stated honestly

- **Spot-only.** No leverage, margin, shorting, derivatives or futures. Users hold their own assets in their own broker accounts (Interactive Brokers, Swyftx; XRPL DEX via self-custodied Xaman wallet).
- **682 instruments across 6 asset classes** (crypto, shares, ETFs, indices, commodities and forex; commodity/index exposure via spot ETFs). 649 in the recommended, forex-excluded configuration.
- **Validated performance (Interactive Brokers "Pro" pricing, spot-only):** profit factor **1.28**, win rate **41.2%**, maximum drawdown **~5%**. Returns scale with account size: roughly **+38.5%** at \$25k, **+105%** at \$50k, **+128.6%** at \$100k, **+109%** at \$250k over the test window.
- **Honest limitation:** at small account sizes, per-order broker commissions dominate and the strategy is **roughly break-even**; it becomes genuinely viable at approximately **\$50k+**.

The disciplined frame. Any strategic-reserve idea rests on the disciplines New Zealand already demonstrates through the NZ Super Fund, and internationally through Norway's GPFG and Singapore's GIC: fund from surplus, spend only the sustainable return, diversify broadly, govern transparently. Trading returns are a stabiliser and store — not the funding engine.

The Ask. An introductory meeting with the RBNZ / Treasury fintech engagement team to (1) demonstrate and independently evaluate the live engine, and (2) discuss the disciplined reserve concept and the appropriate FMA sandbox or licensing pathway. We seek evaluation and guidance, not endorsement, and are committed to operating within New Zealand's regulatory framework.

PART I — Strategic Vision

1. Introduction

New Zealand faces economic volatility, a high cost of living, housing pressure, exposure to commodity swings, and ageing-driven fiscal pressure. This proposal explores how algorithmic trading software and distributed-ledger technology could contribute to economic resilience, disciplined sovereign saving, and more accessible income generation — **backed by a working, deployed platform** rather than theory. Crucially, it is framed on the honest premise that durable prosperity comes from productivity, institutions and disciplined saving; technology and trading returns support that, they do not replace it.

2. Economic Challenges

- **Economic volatility** — reliance on commodity exports exposes NZ to global price swings.
- **Cost of living & housing** — affordability has outpaced wage growth.
- **Capital shallowness** — a savings-and-investment-light economy.
- **Fiscal pressure** — ageing demographics and structural deficits.
- **Digital sovereignty** — dependence on foreign technology and infrastructure.

These are well-diagnosed. The 2026 Budget already moves toward growth (Going for Growth, Invest New Zealand, overseas-investment liberalisation, an investment tax incentive, RMA replacement). This proposal is a complement to that agenda, not a substitute for it.

3. Strategic Reserve Allocation (illustrative, disciplined)

Should New Zealand explore a diversified strategic reserve, discipline should dominate the design. An **illustrative** allocation — weighted toward broadly-diversified traditional assets, with digital-asset and infrastructure exposure as a *minority, governed sleeve* — might look like:

ASSET CLASS	ILLUSTRATIVE WEIGHT	NOTES
Global equities / ETFs	~40%	Broadly diversified, low-cost
Government & high-grade bonds	~25%	Stability buffer
Commodities & precious metals	~10%	Inflation hedge
Real infrastructure	~10%	Renewables, digital, transport
Digital-asset sleeve (infrastructure-grade)	~10%	e.g. ISO 20022-aligned settlement assets — small, governed
Cash / liquidity buffer	~5%	Operational flexibility

This is illustrative, not a recommendation or a fixed portfolio. Final allocation would be set by due diligence, regulatory guidance, professional advice, and market conditions. The digital-asset sleeve is deliberately a minority position — never the core.

4. NZNB Formation & Governance

Any national vehicle should be **Santiago-Principles compliant from day one**: a clear mandate, independence from short-term political interference, professional risk management, and public disclosure. The model is New Zealand's own Super Fund (independent Guardians, clear mandate, world-class governance) and Norway's separation of roles (Ministry sets mandate · investment manager invests · ethics council screens). Governance is the primary risk control: historically, every sovereign-fund failure was a governance failure, not a market or technology failure.

5. Reserve Ledger NZD (RLNZD) & Settlement Technology

Distributed-ledger settlement is a proven, production technology — not speculative. Ripple's **RLUSD**, a regulated USD stablecoin (NYDFS-approved, BNY Mellon custody, monthly attestations), demonstrates the model; the XRP Ledger has settled transactions continuously since 2012. A future **RLNZD** could, in principle, follow the same regulated, fully-reserved model. This is presented as **infrastructure worth studying**, contingent entirely on RBNZ/Treasury appetite, legal design, and full regulatory process — not as a near-term commitment.

6. Multi-Chain Architecture

The relevant technology is not a single chain but complementary rails: **settlement** (XRP Ledger — fast, low-cost, ISO 20022-aligned), **payments/tokenisation** (Stellar), **institutional DLT** (Canton), and **trade finance** (XDC). These are settlement and tokenisation primitives — real-world-asset representation, escrow, oracles, identity — not trading instruments. Their relevance to NZ is as **infrastructure NZ would not need to build from scratch**, subject to due diligence.

7. DLT Applications & Global Adoption

DLT already underpins production applications across **finance & payments**, supply chain, healthcare records, energy trading, real-estate tokenisation, identity, IoT, and government services. Ripple's network

alone spans 80+ financial institutions across 39+ countries. The point for NZ is exposure to **infrastructure adoption**, and optionality for domestic applications (land registries, trade finance for dairy exports, cross-border settlement) — pursued prudently and with iwi partnership where relevant.

8. Critical Infrastructure Ownership (sovereign-vision)

A sovereign nation benefits from resilience in essential sectors — renewable energy, water, food production, digital infrastructure, telecommunications, transport, housing. This is presented as **long-horizon national strategy**, aligned with the energy-security analysis in the companion economic report (notably the post-Marsden-Point fuel-import dependence). Any such investment is a matter for government, funded from genuine surplus, under Norway/Chile-grade rules — well beyond the scope of a private company. Included here as vision, not as an action item for Satis.

9. Regulatory Pathway & Compliance

Satis Omnibus is designed to operate **within** the regulatory framework:

- **No custody of client funds** — users maintain their own regulated broker accounts (Interactive Brokers, Swyftx; XRPL DEX self-custodied). This materially reduces regulatory burden.
- **Delegated KYC/AML** — via regulated brokers.
- **Direct FMA engagement** — we are pursuing the appropriate pathway: FSPR registration; a **Financial Advice Provider (FAP)** licence; and a **DIMS** licence where any discretionary management applies.
- **Not marketed to the public pre-licence.**
- **Built controls** — audit logging, tax reporting, circuit breaker, risk limits.

Proposed engagement: (1) introductory meeting → (2) FMA sandbox/licensing discussion → (3) independent audit of engine logic & security → (4) 12-month live track record → (5) appropriate licensing.

10. Housing & Social Initiatives

Aligned with the economic report's evidence: the durable fixes are **supply-side** — land-use liberalisation (RMA replacement), reliable infrastructure delivery, value capture and user charges. Any fund-linked social initiative should distribute only the *sustainable return*, never the capital, and be governed transparently. These are government matters; Satis's role is limited to the software and the honest evidence base.

11. Universal Basic Income — honestly framed

A citizens' dividend funded by a sovereign fund's *sustainable return* is a legitimate long-horizon idea — but only at genuine scale and under strict discipline. **It cannot be funded by trading alpha.** Per the companion report: returns are volatile and mean-revert; a fund is a store and a stabiliser, not the engine. The decentralised Satis path offers individuals a *tool* to pursue their own income on their own accounts — explicitly a test and a tool, not guaranteed income, and viable only at sufficient account size.

12. Economic Impact — measured claims

A well-governed reserve can improve **resilience** (a diversified buffer against shocks) and **intergenerational equity** (saving windfalls rather than consuming them). It cannot manufacture productivity. The honest position, straight from the economic report: build the real economy first — people, competition, investment, institutions — and let a disciplined fund compound quietly alongside it.

PART II — NZLIX Progress Report (Trading Engine)

13. Performance — validated, spot-only, Interactive Brokers Pro

The authoritative figures below come from the full-universe backtest on the live product configuration (spot-only, Interactive Brokers "Pro" commission model). These supersede all earlier long/short and CFD-based figures.

METRIC	VALUE
Strategy	Spot-only, long-only (no shorting/leverage/derivatives)
Profit factor	1.28
Win rate	41.2%
Maximum drawdown	~5%
Instruments	682 total / 649 recommended (forex excluded)
Broker cost model	Interactive Brokers Pro (per-order commissions)

Returns scale with account size (test window):

ACCOUNT SIZE (NZ\$)	RETURN	NOTE
\$25,000	~+38.5%	Commissions still a meaningful drag
\$50,000	~+105%	Around the viability threshold
\$100,000	~+128.6%	Commissions well diluted
\$250,000	~+109%	Capacity effects begin

The honest limitation, stated plainly: below ~\$50k, per-order commissions dominate and the strategy is roughly **break-even**. This is a material constraint and is disclosed deliberately.

14. What changed (engine evolution)

The engine's edge comes from **exit management**, not entry prediction: a ratcheting trailing-stop that locks in a share of peak unrealised profit, plus a trend-based trailing exit that lets winners run, and a tight

maximum stop that keeps individual losses small. Successive versions improved the profit factor and sharply reduced drawdown. Detailed, per-instrument, trade-by-trade results are available live in the app's backtest engine (satisomnibus.com/backtest) rather than reproduced here, so any evaluator sees current data, not a static snapshot.

15. Exit & instrument analysis

Consistent with the exit-driven edge, most trades close either at the tight stop (small, controlled losses) or via the profit-lock trailing exit (booked gains). Per-instrument performance varies widely; the strategy relies on **breadth and disciplined exits across many instruments**, not on any single market. Current breakdowns are viewable live rather than asserted here.

16. Quality filters & sizing

Signals are graded and position-sized so that risk per trade stays small (typically ~0.5–1% of balance) with total exposure capped (~10%). The recommended configuration excludes forex (net-negative after broker minimums) and keeps a higher-timeframe trend filter on. The edge is in the exit system and risk control, not in an over-tight entry filter.

17. Scaling & compounding — with a caution

Compounding can be powerful, but **projected compounding curves are illustrative only** and assume conditions that will not hold continuously. Real results depend on market regime, execution friction, and fees. We deliberately avoid headline "\$X per week by month N" promises: the honest statement is that the strategy needs ~\$50k+ to be viable, and even then returns are volatile and not guaranteed.

18. Path to sustainable income — realistic

For an individual, the realistic path is: reach a viable account size (~\$50k+), run the recommended spot-only configuration, keep costs low, and treat early live runs as **tests, not income**. Smaller accounts should expect roughly break-even results and use the platform to learn, not to depend on. This is the honest version of the "income for anyone" idea.

19. Decentralised model

Each user runs the software independently on their own account; users do not compete with one another, and the platform never holds their funds. Funding source is market returns (inherently variable), custody is the user's own regulated broker, and there is no intermediary. Its honest limitation — small accounts are ~break-even — is stated alongside its strengths.

20. Institutional deployment

At larger scale, commission drag falls away and the strategy's characteristics (disciplined exits, tight stops, breadth) are better suited to evaluation. Any institutional use would require independent audit, a live track record, and appropriate licensing first. Returns should be stress-discounted for live friction (slippage, fees, latency) — we assume a material haircut to backtest figures.

21. Asset-agnostic design

The engine treats any instrument with standard candle data uniformly; adding an instrument is a configuration change, not a code change. It currently covers **682 instruments across 6 asset classes** and **8 global exchanges** (NYSE, NASDAQ, NZX, ASX, LSE, XETR, TSE, HKEX). It applies the same spot-only logic and risk controls universally.

22. Live trading infrastructure

Deployed at satisomnibus.com: a real-time position manager (replicating exact backtest exit logic, persisted to database), a news-sentiment filter that blocks buys into clearly negative news, multi-broker execution (**Interactive Brokers, Swyftx, XRPL DEX via Xaman**), a built-in backtesting engine, and a public performance dashboard (no login required) so any evaluator can verify the engine is operational.

23. Security architecture

Defense-in-depth aligned with SOC 2 / ISO 27001 principles: AES-256-GCM encryption of broker keys, JWT + optional TOTP 2FA, TLS 1.3, rate limiting, security headers, append-only audit logging, progressive account lockout, GDPR data export/deletion, a trading circuit breaker, and token revocation. Planned hardening: independent penetration test, code review, and formal certification during the compliance phase.

24. Regulatory compliance readiness

- **No fund custody** — clients hold their own funds.
- **Delegated KYC/AML** via regulated brokers.
- **Tax reporting** built in (NZ/AU/US/UK) with reminders.
- **Full audit trail** for inspection and dispute resolution.
- **Risk controls** — limits, circuit breaker, quality gates, position sizing.
- **Data** — hosted in-region; NZ-based hosting under consideration.

25. Comparison to NZ investment vehicles — honest

We do **not** claim to beat managed funds on a like-for-like basis. Backtest returns are not annualised live results, are not risk-adjusted against a fund's mandate, and carry the ~\$50k viability floor and full volatility. The honest comparison is qualitative: the engine offers active, rules-based risk management (tight stops, profit-locking exits) on a spot-only basis, with the user in control of their own funds — evaluated properly through a live track record, not asserted against the NZ Super Fund or KiwiSaver.

26. Risk assessment

RISK	LIVE REALITY	IMPACT
Small-account commission drag	~break-even below ~\$50k	Significant
Slippage & fees	Not in backtest; real in live	Moderate
Market regime shift	Backtest is a finite window	Significant
Execution latency	Scanner + API delay	Moderate
Broker/exchange risk	Uptime, limits	Moderate
Cybersecurity	Platform breach	Significant
Regulatory change	Evolving crypto/advice rules	Moderate

Mitigations: tight 2% max stop, profit-locking exits, circuit breaker, no leverage, delegated custody, and — above all — **honest disclosure of the small-account limitation** so no user is misled.

Conclusion & Next Steps

This is an ambitious vision backed by an honest, working product. The disciplined framing — save the surplus, spend only the return, diversify, govern transparently, and never rely on trading alpha to fund ongoing spending — is what makes it credible. The trading engine is one component and one tool; the strategy's honesty about its own limits is a feature, not a weakness.

Proposed next steps: (1) introductory meeting with RBNZ / Treasury fintech; (2) FMA sandbox/licensing discussion; (3) live demonstration and independent evaluation of the engine; (4) 12-month verified track record; (5) appropriate licensing before any public or institutional deployment.

Satis Omnibus — "Enough for All." Live at satisomnibus.com. Figures reflect the corrected, spot-only product as at August 2026; verify against the live site before relying on them. This document is not financial advice. Companion documents: honest Executive Summary (v8); Treasury Investment Policy Statement; "Enough for All" Growth & Fiscal-Capacity Report.