



# **Table of Contents**

Chapter 1 — Phased Readiness Assessment	. 2
Chapter 2 — Gap Analysis and Capacity Building	. 4
Chapter 3 — Parallel Actions for Hybrid RECs	. 5
Chapter 4 — Nordic Council and EUSL Case Studies	. 8
Chapter 5 — Transition to Full Membership	



# REC and Country Onboarding & Readiness Protocol

Preamble and Applicability. This Protocol is promulgated under the GSIA Charter and shall be read consistently with Documents 00–14 and the affirmed order of prevalence: mandatory national public law; the GSIA Charter; this Protocol; and downstream instruments and annexes. The constitutional allocation of functions remains binding. The GSIA SCE exercises mandate and oversight; GSIA Holding AB maintains canonical standards, maturity models, evidence taxonomies, and onboarding toolkits without operational entanglement; GSIA AB conducts onboarding operations solely under Service Level Agreements (SLAs) with the SCE or Member-mandated SPVs; and, where bankability or continuity so requires, Hosted Ownership may be used through EUSL or another GSIA-approved SPV strictly within a ring-fenced perimeter, subject to non-attachment, negative pledge, discrete ledgers and bank accounts, and a binding reversion covenant to the Member upon readiness.

Publication operates as a control with lawful redaction and time-limited deferrals by reasoned resolution. Data-protection roles are explicit (controller/processor); DPIAs are performed for high-risk processing; IAM enforces least-privilege and multi-factor authentication; logs are immutable; encryption is mandatory in transit and at rest. Domestication proceeds through gated progression—shadowing  $\rightarrow$  dual-key  $\rightarrow$  lead-role  $\rightarrow$  system handover  $\rightarrow$  legal localisation  $\rightarrow$  readiness certification—verified under Document 09 (External Validation) and reflected in tranche logic pursuant to Document 10 (Stress Testing).

#### Chapter 1 — Phased Readiness Assessment

- **1.1 Purpose and Constitutional Position.** The phased readiness assessment is the authoritative mechanism by which GSIA determines whether a Regional Economic Community (REC) or Country Member (collectively, "Applicant") possesses the institutional, fiduciary, safeguards, digital trust, and domestication capacities required to onboard to GSIA programmes and financing channels. The assessment is commissioned by the GSIA SCE, executed operationally by GSIA AB under SLA, and quality-assured by GSIA Holding AB's standards unit and independent validators under Document 09, with full cooperation duties on the Applicant.
- **1.2** Assessment Structure and Maturity Model. The assessment employs a six-pillar maturity model aligned to the GSIA constitutional logic and DFI-compatible expectations, each graded on a reasoned scale (e.g., Insufficient / Basic / Substantial / Advanced) with clearly defined evidentiary thresholds:
  - 1. **Mandate & Governance.** Constitutional and statutory basis for participation; designation of competent authorities; conflict-of-interest rules and recusal; board/committee structures for programme decisions; publication doctrine adoption.
  - 2. **Fiduciary & Custody.** Treasury architecture; discrete ledgers and bank accounts; four-eyes approvals; segregation of duties; countersignature thresholds; Flowhub (or equivalent) custody feasibility; negative pledge and non-attachment enforceability; escrow and step-in readiness.
  - 3. **Safeguards & Procurement Integrity.** ESG standards, gender and inclusion policies, procurement rules, sanctions and debarment interfaces, grievance redress mechanisms, and whistleblower protections, consistent with Document 06 and Document 11.



- 4. **Data Protection & Digital Trust.** Controller/processor allocations; DPIA capability; lawful bases; localisation and sovereignty posture; IAM; logging; encryption; incident response; evidence repositories; publication/redaction processes, per Document 12.
- 5. **MEL & Independent Verification.** Unified MEL adoption; indicator frameworks; baselines; verification protocols; evaluation scheduling; external validation pathways per Document 09; EFFORT-style programme transparency readiness.
- 6. **Domestication & Continuity.** Gate planning; staffing and secondments; learning-by-doing arrangements; continuity/DR targets; legal localisation track; readiness certification pathway; exit/wind-down preparedness (Document 10).
- **1.3 Evidence, Methods, and Publication.** Evidence consists of legal instruments, policies, organisational charts, authority matrices, treasury and banking attestations, DPAs and ROPAs, DPIAs, procurement dossiers, MEL frameworks, and continuity runbooks. Methods include document review, structured interviews, site/system inspections, data lineage tracing, treasury and FX walkthroughs, and sampling. Findings and grades are reasoned and published with lawful redaction; deferrals for security or procurement integrity are time-limited and entered in the deferral register with a sunset review.
- **1.4 Staging and Outcomes.** The phased assessment proceeds through three staged conclusions:
  - Conditional Onboarding (Stage A). Substantial capacity in Mandate & Governance and Safeguards; Basic or better in the remaining pillars; ring-fenced Hosted Ownership enabled; activation limited to early domestication gates (shadowing/dual-key) with targeted capacity actions.
  - Operational Onboarding (Stage B). Substantial capacity across all pillars; Advanced in Fiduciary, Data Protection, and MEL; eligibility for dual-key to lead-role transitions, subject to tranche logic and verification.
  - Readiness Certification (Stage C). Advanced capacity and verified control operation over a
    defined period; eligible for system handover, legal localisation, and title reversion of Hosted
    Ownership portfolios; survivals (audit, records, warranties, liabilities) persist as stipulated.
- **1.5 Triggers and Re-Assessment.** Triggers for expedited or periodic re-assessment include tranche milestones, significant incidents (e.g., data breach, sanctions alert, procurement anomaly), material legal changes, or domestication gate transitions. Material regressions may revert staging or activate protective measures, including tightened authority matrices or step-in, without prejudicing Member ownership.
- **1.6 Interfaces and Concordance.** The readiness assessment references and aligns with: Document 04 (Eligibility and Leasing), Document 05 (Institutional Governance), Document 06 (ESG & Fiduciary), Document 08 (Unified MEL), Document 09 (External Validation), Document 10 (Treasury/Continuity), Document 11 (Compliance & Sanctions), and Document 12 (Digital Trust). Where an Integrated National Financing Framework (INFF) exists, assessment findings are cross-walked to the national financing taxonomy for transparency and macro-fiscal coherence without derogating ring-fencing.
- **1.7 Records, Survivals, and Appeals.** Assessment dossiers, workpapers, and decisions are archived per Charter or statutory maxima. Survivals include confidentiality, data-protection obligations, audit and access rights, and publication registers. Appeals on material findings or staging outcomes lie to the



Appeals Board per Document 09; protective measures remain in force unless a reasoned stay is granted.

#### Chapter 2 — Gap Analysis and Capacity Building

- **2.1 Purpose and Constitutional Position.** Gap analysis converts readiness findings into a binding, time-sequenced Capacity Action Plan (CAP) that remedies deficiencies without diluting GSIA fiduciary standards, publication doctrine, or domestication gates. The CAP is approved by SCE resolution, executed by GSIA AB under SLA, with Agenda 74 Agency designated as initial performer where rapid stand-up is required. DESA entities (e.g., SUDESA, CODESA or their regional/national counterparts) are the default recipient-operators for capacity resources and the locus for learn-by-doing domestication.
- **2.2 CAP Structure and Prioritisation.** The CAP mirrors the six-pillar model and prioritises controls that most strongly affect fiduciary integrity, legal compliance, data protection, and verifiability. Each action specifies: (i) deficiency and risk; (ii) remedy and control design; (iii) responsible owner(s) on the Applicant side and GSIA delivery role; (iv) dependencies; (v) evidence of completion; (vi) verification method; (vii) publication unit and redaction plan; and (viii) domestication gate impact. High-criticality actions (Class A) are front-loaded and tied to tranche releases or Hosted Ownership activations.
- **2.3 Delivery Modalities.** Capacity is delivered through a defined blend of:
  - Shadowing and Dual-Key Operations. Applicant personnel embedded in finance, procurement, MEL, and digital trust functions from day one; approvals shared under calibrated countersignature thresholds.
  - Secondments and Exchanges. Targeted secondments between Applicant authorities/DESA entities and GSIA teams; exchanges with partner institutions where admissible; aligned to Document 19 for certification pathways.
  - Process and Systems Implementation. Deployment of Flowhub custody (or approved equivalent), discrete bank accounts and ledgers, IAM and logging baselines, DPIA toolkits, procurement and sanctions workflows, grievance redress channels, and EFFORT-style publication templates.
  - Policy Localisation and Legal Drafting. Drafting or updating DPAs, Host Country Agreements, procurement directives, publication rules, and negative pledge/non-attachment clauses to align with national law while preserving GSIA safeguards; escrow and step-in provisions ensured.
  - Exercises and Assurance. Table-top and live exercises for continuity (RTO/RPO), treasury stress
    tests, MEL verification rehearsals, and external validation dry-runs; corrective actions tracked
    to closure.
- **2.4 Evidence and Verification.** Completion is evidenced by artefacts (policies, matrices, registers), system configurations and logs, reconciliations, DPIAs and ROPAs, MEL baselines and instruments, procurement dossiers, and publication outputs. Verification follows Document 09 methodologies (sufficiency, appropriateness, chain-of-custody, reproducibility) and is recorded for publication with lawful redaction. Partial completion requires time-boxed remediation with enhanced monitoring.
- **2.5 Financing, Ring-Fencing, and Hosted Ownership.** Capacity resources are financed from Member subscriptions, ring-fenced Flowhub commission (≤5% absent Charter amendment), grants and pooled



funds, or DFI technical assistance windows. Funds are held in discrete accounts and tracked in separate ledgers; negative pledge and non-attachment apply. Where the Applicant is temporarily ineligible for sovereign or DFI flows, capacity funds may be channeled via Hosted Ownership within a ring-fenced perimeter, with a reversion covenant to the Member upon readiness; no private distribution is permitted.

- **2.6 Publication and Transparency.** CAPs, milestone reports, verification notes, and rectification dockets are **published** with lawful redaction. Deferrals for security, procurement integrity, or privacy are reasoned, time-limited, and entered in the deferral register with sunset review. Executive summaries are published contemporaneously, and EFFORT-style dashboards link capacity expenditure to outputs, results, and domestication status.
- **2.7 Risk Management and Sanctions Interface.** Material slippage on Class A actions, repeated verification failures, or sanctionable practices trigger protective measures: tightened authority matrices, payment holds, scope reduction, or step-in. Investigations proceed under Document 11; tranche logic adjusts under Document 10; dispute resolution follows the Legal Instruments Compendium without prejudicing essential safety functions.
- **2.8 Domestication Milestones and Readiness Certification.** CAP actions are explicitly tied to domestication gates. Shadowing concludes when Applicant personnel demonstrate control understanding; dual-key ends when joint operation meets tolerance thresholds; lead-role is achieved upon sustained operation under GSIA oversight; system handover follows successful escrow and key ceremonies; legal localisation completes upon enactment of necessary instruments and registrations; readiness certification is granted on unqualified or acceptably qualified assurance over core controls, data governance, and fiduciary propriety.
- **2.9 Records, Survivals, and Learning.** CAP records, evidence packs, verification results, publication units, and deferral logs are archived per Charter maxima. Survivals include confidentiality, data-protection obligations, audit and access rights, and IP in templates and methods. GSIA Holding AB issues periodic Lessons and Methods Circulars to update the onboarding toolkit, scoring matrices, and verification playbooks.

## Chapter 3 — Parallel Actions for Hybrid RECs

Preamble to Chapter 3. This Chapter is promulgated under the GSIA Charter and shall be read consistently with Documents 00–14 and Chapters 1–2 of this Protocol. The established order of prevalence applies: mandatory national public law; the GSIA Charter; this Protocol; and downstream instruments and annexes. The constitutional allocation of functions remains binding. The GSIA SCE exercises mandate and oversight; GSIA Holding AB maintains canonical standards, maturity models, evidence taxonomies, and onboarding toolkits without operational entanglement; GSIA AB executes onboarding under SLAs; Agenda 74 Agency may act as initial performer during early cycles; and Hosted Ownership may be invoked to achieve bankability and continuity within ring-fenced perimeters subject to non-attachment, negative pledge, discrete ledgers and bank accounts, and an unconditional reversion covenant to the Member upon readiness. Publication is a control with lawful redaction and time-limited deferrals recorded by reasoned resolution. Controller/processor roles are explicit; DPIAs are performed for high-risk processing; IAM enforces least-privilege and multi-factor authentication; logs are immutable; encryption is mandatory in transit and at rest. Domestication follows the gated progression—shadowing → dual-key → lead-role → system handover → legal localisation → readiness certification—and is verified under Document 09.



- **3.1 Purpose and Constitutional Position.** Hybrid RECs (including, without limitation, EUSL, AFSL, and future AMSL/ASSL or other GSIA-recognised hybrids) operate across multi-jurisdictional strata and sectoral mandates while exhibiting REC-like coordination functions. This Chapter establishes the parallel action doctrine to onboard such hybrids without delaying country-level progression, preserving constitutional separation of functions, fiduciary integrity, publication discipline, and domestication gates at both the hybrid and the country layers.
- **3.2 Parallel Action Doctrine.** Parallel action permits concurrent readiness workflows at: (i) the Hybrid REC layer (governance, fiduciary standards, safeguards, digital trust baselines, MEL harmonisation, and inter-country coordination); and (ii) the Country layer (national domestication gates, legal localisation, banking mandates, and system handover). Neither layer may derogate from Charter safeguards; rather, controls are mirrored with proportional tailoring. The GSIA SCE issues a Parallel Action Resolution that defines scope, sequencing, authority matrices, publication schedules, and interlocks between layers.
- **3.3 Dual-Layer Readiness Model.** The maturity model in Chapter 1 is applied independently to the hybrid and to each participating country, with explicit inter-layer dependencies identified ex ante:
  - Mandate & Governance. The hybrid adopts REC-equivalent statutes and committees
    competent for cross-border standardisation and portfolio stewardship, while each country
    designates its competent authorities and domestic oversight bodies.
  - Fiduciary & Custody. The hybrid establishes Flowhub (or approved equivalent) custody blueprints, inter-country escrow logic, negative pledge and non-attachment baselines, and model step-in clauses; each country implements discrete ledgers and bank accounts and local signatory matrices aligned to the blueprint.
  - Safeguards & Procurement Integrity. The hybrid promulgates a harmonised safeguards code and cross-border debarment recognition; each country localises procedures, suppliers' registries, and grievance channels to national law.
  - Data Protection & Digital Trust. The hybrid defines controller/processor patterns, DPIA templates, classification taxonomies, and cross-border transfer playbooks; each country executes DPIAs, localisation, and IAM/logging baselines in its tenancy or perimeter.
  - **MEL & Independent Verification.** The hybrid sets indicator libraries and verification methods; each country populates baselines, sampling frames, and evaluation schedules.
  - Domestication & Continuity. The hybrid maintains the domestication choreography and cross-border continuity playbooks; each country executes gates and DR/BCP drills appropriate to local infrastructure and law.
- **3.4 DESA** as Recipient-Operator; Agenda 74 as Initial Performer. As a default rule, DESA-class entities (e.g., SUDESA, CODESA, or regionally adapted DESA units) are designated recipient-operators for programme funds, rather than sovereign treasuries, to prevent fungibility and to preserve verifiability within Flowhub custody. Where speed or complexity warrants, Agenda 74 Agency may be mandated as initial performer to establish controls, conduct learn-by-doing shadowing, and reach the dual-key stage, after which lead-role responsibilities transfer to DESA and then to competent public authorities at system handover.
- **3.5 Portfolio Ring-Fencing and Waterfalls.** Hybrid portfolios adopt multi-tier ring-fencing: (i) a Hybrid Master Account and ledger for cross-border receipts and shared services; and (ii) Country Sub-Accounts



and ledgers for national execution. Waterfalls are algorithmic and audit-ready, allocating liquidity buffers, O&M reserves, safeguards financing, MEL costs, and capped Flowhub commission (≤5% absent a Charter-conforming amendment), with no private distribution. Inter-tier transfers occur only against verifiable milestones and are recorded with immutable logs.

- **3.6 Controller/Processor Allocation and DPIAs.** The hybrid ordinarily serves as controller for cross-border coordination datasets; each country's competent authority (or DESA) serves as controller for national processing. GSIA AB and approved vendors act as processors under DPAs. Cross-border transfers require lawful mechanisms and supplementary measures where sovereignty or localisation constraints exist, with DPIAs completed prior to fieldwork. Evidence escrow and integrity artefacts (hashes, timestamps) preserve verifiability where export is restricted.
- **3.7 Parallel Tranche Logic and Assurance.** Tranche releases may be split: a Hybrid Tranche for shared infrastructure, standards, and regional services; and Country Tranches tied to national domestication gates. Independent validators (Document 09) opine on both layers. Adverse findings at either layer may **pause** the corresponding tranche without automatically prejudicing the other, unless findings indicate contagion risks requiring portfolio-wide protective measures.
- **3.8 Procurement Integrity and Sanctions Interlocks.** The hybrid establishes cross-border procurement frameworks, sanctioned-party screening, and reciprocal recognition of debarments; countries run competitions under localised rules that meet or exceed hybrid standards. Allegations of fraud, corruption, collusion, coercion, or obstruction trigger interim protective measures (payment holds, scope reduction, step-in) and referral to Investigations (Document 11). Conflicts and recusals are recorded at both layers and published with lawful redaction.
- **3.9 Continuity, Stress Testing, and FX.** Continuity and stress testing follow Document 10: hybrid-level DR/BCP for shared services and national DR/BCP for in-country systems; no speculative positions in FX; currency matching where feasible; hedge instruments limited to risk reduction; and liquidity buffers computed at both layers. Breaches of KRIs (buffer shortfalls, hedge ineffectiveness, reconciliation breaks) trigger escalations per Document 17.
- **3.10 EFFORT Transparency and INFF Interfaces.** The hybrid maintains an EFFORT-style portfolio dashboard that consolidates Expenditure, Financing sources, Flowhub custody status, Outputs, Results, and Transition milestones across countries, published with lawful redaction. Where INFFs exist, country-level disclosures map to national classifications for macro-fiscal coherence without derogating ring-fencing or publication doctrine.
- **3.11 Hosted Ownership in Hybrids.** Where countries are ineligible for sovereign or DFI flows, Hybrid REC portfolios may employ Hosted Ownership via an approved SPV (including EUSL, where applicable) strictly within a ring-fenced perimeter. Title lists, non-attachment, negative pledge, discrete ledgers and bank accounts, and reversion covenants are mandatory. At readiness certification, title is transferred to the Member or designated public custodian; survivals—audit rights, records, warranties, liabilities—persist as stipulated.
- **3.12 Capacity Building and Certification Pathways.** Capacity actions (Chapter 2) are delivered simultaneously at the hybrid and country layers: hybrid-level standards setting, toolkits, and regional service desks; country-level shadowing, dual-key operations, and legal localisation. Certification pathways culminate in Readiness Certificates at the country layer and a Hybrid Operating Certificate for the REC-like entity. Either certificate may be conditional or time-limited, with sunset review and required re-validation.



- **3.13 Decision Rights, Appeals, and Publication.** The **Parallel Action Resolution** defines decision rights and escalation routes. Material staging or tranche decisions are published with lawful redaction; deferrals are reasoned, time-limited, and recorded in the deferral register. Appeals lie to the Appeals Board under Document 09; protective measures remain in force unless a reasoned stay is granted.
- **3.14 Records, Survivals, and Learning.** Hybrid and country dossiers, authority matrices, waterfalls, DPIAs, validations, publications, and deferrals are archived for the longer of Charter, statutory, or covenant periods. Survivals include confidentiality, data-protection obligations, audit and access rights, and IP in templates and methods. GSIA Holding AB **issues Lessons and Methods Circulars** reflecting hybrid-country interlock findings to refine toolkits, scoring matrices, and verification playbooks.

#### Chapter 4 — Nordic Council and EUSL Case Studies

- **4.1 Purpose and Case Selection.** This Chapter presents two applied case studies to demonstrate the Protocol's readiness doctrine in heterogeneous contexts: (i) a REC-level engagement with the Nordic Council of Ministers operating as a regional policy and cooperation platform with mature public-sector capabilities and high data-protection expectations; and (ii) EUSL as a Hybrid REC, concurrently interfacing with REC-level policy bodies and country administrations while acting as bridge to programme sponsors (e.g., PCPP and PCGG) and DESA implementers. Both cases operationalise Flowhub custody, publication doctrine, data-protection and sovereignty constraints, and domestication gates.
- 4.2 Nordic Council Case—REC-Level Onboarding. The Nordic Council engagement proceeds under a Parallel Action Resolution adapted for a mature regional cooperation forum. The Council's secretariat, committees, and working groups constitute the REC layer for governance, standards harmonisation, and knowledge diplomacy, while Member States' competent authorities serve as country layers for domestication. The readiness assessment determines a presumptively high score in Mandate & Governance, Safeguards, and Data Protection; the principal onboarding actions therefore focus on fiduciary custody alignment (discrete ledgers and bank accounts per programme; authority matrices mapped to four-eyes, segregation of duties, and countersignature thresholds), publication registers consistent with national transparency law and Nordic practice, and EFFORT-style public dashboards to link expenditure, financing, Flowhub custody, outputs, results, and transition milestones. Controller/processor allocations designate the Council or a designated national authority as controller for REC-level datasets that are not national-sovereign restricted, while national controllers retain sovereignty over in-country processing and localisation. DPIAs precede any cross-border replication; evidence escrow and cryptographic integrity artefacts are employed where export constraints exist. Treasury integration prioritises currency-matching to domestic obligations and limits hedging to risk reduction, with continuity and DR/BCP exercised at both REC and national layers. Pipeline items are routed to DESA-class recipients (as applicable to sector and geography) to prevent fungibility through general treasuries and to preserve verifiability under Flowhub custody; Agenda 74 Agency may act as initial performer for rapid stand-up, with programmed handover to DESA by the dual-key milestone and to competent authorities by readiness certification.
- **4.3 Nordic Council—Co-Financing and INFF Interfaces.** Co-financing standards are harmonised through intercreditor deeds acknowledging REC oversight prerogatives while preserving GSIA's ring-fencing, negative pledge, non-attachment, step-in rights, and publication covenants. Where Member States maintain Integrated National Financing Frameworks (INFFs), REC-level contributions are mapped to national budget classifications for macro-fiscal coherence without derogating custodial safeguards. Conditions precedent include adoption of Flowhub custody and signatory matrices, safeguards



approvals, DPAs and DPIAs for high-risk processing, MEL verifications, and publication readiness. Tranche logic is split between REC-level shared services and national domestication tranches; adverse findings pause the relevant tranche with contagion analysis to determine whether portfolio-wide protective measures are required.

- **4.4 EUSL Case**—**Hybrid REC Onboarding.** EUSL operates as a Hybrid REC with programme sponsorship responsibilities for PCPP and PCGG, while interlinking with DESA implementers (e.g., SUDESA, CODESA) and country authorities. Parallel action is therefore activated from inception: EUSL establishes Hybrid-layer governance (board, committees, standards unit), fiduciary blueprints (Flowhub architecture, escrow logic, step-in rights, reversion mechanics), cross-border safeguards codes (including reciprocal debarment and sanctions recognition), controller/processor patterns, and indicator libraries for MEL. Country layers adopt and localise these through DESA recipient structures and national competent authorities. Custody is multi-tier: a Hybrid Master Account and ledger for cross-border receipts and shared services, and Country Sub-Accounts and ledgers with separate signatory matrices and waterfall rules allocating liquidity buffers, O&M, safeguards, MEL, and capped Flowhub commission within the constitutional baseline. No private distribution is permitted from ring-fenced funds. Hosted Ownership may be invoked for ineligible countries, with strict perimeter isolation and reversion covenants.
- **4.5 EUSL**—**Data-Protection and Sovereignty.** Given the likelihood of multi-jurisdictional processing, EUSL implements controller roles at the hybrid level for cross-border coordination datasets and ensures that national controllers retain stewardship over in-country personal data processing, localisation, and lawful transfer mechanisms. DPIAs precede any high-risk processing; logs are immutable; IAM is least-privilege with multi-factor authentication; encryption is mandatory in transit and at rest; break-glass access is recorded and subject to post-event review. Where cross-border evidence cannot lawfully be exported, EUSL employs local evidence escrow with cryptographic integrity artefacts to preserve verifiability for external validation and audit.
- **4.6 EUSL**—**Domestication and Handover.** Domestication gates are front-loaded in all term sheets and implementation instruments: shadowing by DESA and public personnel is mandatory from day one; dual-key approvals govern critical fiduciary and data-protection actions; lead-role transfer is conditioned on verified operating effectiveness; system handover includes key ceremonies, configuration baselines, and documentation escrow; legal localisation completes with national registration and statutory compliance; readiness certification is issued upon unqualified or acceptably qualified assurance over core controls, data governance, and fiduciary propriety. Agenda 74 Agency's initial performer role is time-bounded, with a scheduled withdrawal aligned to lead-role transition.
- **4.7 Publication, Appeals, and Survivals.** Case-specific registers—Pipeline, Funding, Commission, Grants and Pools, Contracts and Awards, Deferrals, and Appeals—are maintained and **published** with lawful redaction. Deferrals for procurement or negotiation integrity are reasoned, time-limited, and sunset-reviewed. Appeals on material decisions lie to the Appeals Board under Document 09; protective measures remain in force unless a reasoned stay is granted. Survivals include audit and access rights, publication registers, confidentiality constrained to lawful scope, data-protection obligations, and intellectual property in templates and methods.

## Chapter 5 — Transition to Full Membership

**5.1 Purpose and Constitutional Position.** This Chapter codifies the pathway by which Applicants—RECs, Hybrid RECs, and Countries—progress from onboarding to full membership under the GSIA



Charter. Full membership entails confirmed mandate participation, financial obligations compliance, operational conformity to fiduciary and safeguards standards, sustained publication discipline, and successful domestication culminating in readiness certification.

- **5.2 Eligibility and Pre-Conditions.** Eligibility for full membership requires: (i) completion of a Phased Readiness Assessment to at least Operational Onboarding (Stage B) with defined timelines to readiness certification; (ii) adoption and operation of Flowhub (or approved equivalent) custody with discrete ledgers and bank accounts, negative pledge, non-attachment, four-eyes approvals, segregation of duties, and calibrated countersignature thresholds; (iii) adoption of ESG safeguards, procurement integrity rules, sanctions and debarment interfaces, grievance redress mechanisms, and whistleblower protections; (iv) data-protection governance with controller/processor allocations, DPIAs for high-risk processing, IAM, immutable logs, encryption, and incident response protocols; (v) MEL alignment and functioning verification and evaluation schedules; (vi) publication registers and adherence to lawful redaction and time-limited deferral rules; and (vii) an operational domestication plan with shadowing, dual-key, lead-role, system handover, legal localisation, and readiness certification milestones.
- **5.3 Financial Obligations and Standing.** The Applicant demonstrates timely compliance with subscription payments (€1,000,000 for RECs; €250,000 for States; Hybrid RECs by reasoned resolution) and any agreed ring-fenced cost-recovery obligations. Arrears are either settled or subject to a reasoned, time-limited deferral plan approved by SCE resolution. Flowhub commission is applied within the constitutional baseline (≤5%) and ring-fenced to governance, assurance, risk, and capacity; any variance requires a Charter-conforming resolution with published justification.
- **5.4 Handover and Legal Localisation.** Prior to full membership, the Applicant must complete system handover for at least one material programme or portfolio, including delivery of key ceremonies, configuration baselines, operating manuals, and documentation escrow. Legal localisation is demonstrated by registration of instruments, mandates, signatory matrices, and, as applicable, domestication of data-protection and procurement instruments to national law. Where Hosted Ownership has been used, title reversion to the Member or designated public custodian is executed, and inventories and reconciliations are validated by independent assurance. Survivals—audit rights, records, warranties, liabilities—persist for defined periods.
- **5.5 Resolution on Full Membership.** The GSIA SCE adopts a Full Membership Resolution upon evidence that eligibility and pre-conditions are met. The Resolution states scope, effective date, rights and obligations, domestication status, survivals, and any conditions subsequent with timelines. The Resolution is published with lawful redaction; deferrals are reasoned, time-limited, and recorded with sunset review.
- **5.6 Conditions Subsequent and Monitoring.** Conditions subsequent may include: completion of remaining domestication gates across specific portfolios; closure of Class A corrective actions; certification under designated ISO-aligned domains; or establishment of national publication registers. Progress is monitored through MEL-linked tranche logic, independent validation cycles, and Internal Audit reviews. Material slippage re-opens protective measures (tightened authority matrices, payment holds, scope reductions, step-in), without prejudicing Member ownership.
- **5.7 Rights and Protections Upon Full Membership.** Full Members retain voting and participation rights per the Charter, access GSIA programme windows and Flowhub custody on published terms, and participate in accreditation and standards governance through designated committees. Protections include: recognition of sovereignty and lawful localisation; publication with lawful redaction; equitable



treatment under intercreditor and co-financing arrangements; and access to the Appeals Board for administrative decisions affecting rights or obligations.

- **5.8 INFF and EFFORT Integration Post-Admission.** Full Members with INFFs continue to map GSIA-related flows to national classifications for macro-fiscal coherence. Public reporting employs **EFFORT** presentation to link expenditure, financing sources, Flowhub custody status, outputs, results, and transition progress across portfolios, preserving publication doctrine and redaction rules.
- **5.9 Suspension and Exit.** Failure to maintain standards may ground suspension by reasoned SCE resolution, proportionate to risk and time-limited, with prescribed corrective actions and verification milestones. Persistent or material breaches may result in exit, following the dispute and appeals logic and wind-down procedures in Document 10, preserving survivals and ensuring orderly reallocation or reversion of ring-fenced assets.
- **5.10 Records, Survivals, and Learning.** Full Membership dossiers—assessments, resolutions, evidence packs, handover records, readiness certificates, publication registers, and deferral logs—are archived per the longer of Charter, statutory, or covenant periods. Survivals include confidentiality, data-protection obligations, audit and access rights, and intellectual property in templates and methods. GSIA Holding AB issues Lessons and Methods Circulars to refine onboarding standards, domestication gates, and verification playbooks based on post-admission performance.