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CUPIO COMPANY BUSINESS PLAN

*ENGAGEMENT FOR THE CIVIL SECTOR TO BE PART OF CHARITY AS A
BUSINESS*

CREATED BY

EUSL AB

Care to Change the World

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Cupio Company - Business Plans

1. Executive Summary

Cupio Company is the WOSL Group's civic engagement and incentive platform, designed to operationalize social equity at the level of individual behavior. It introduces a points-based system that rewards socially responsible actions—such as volunteering, ethical consumption, and participation in community programs—creating a measurable feedback loop between contribution and recognition. This model leverages behavioral economics and digital engagement to transform social responsibility from an abstract ideal into a tangible, gamified experience.

Nature of the entity: Purpose-driven AB (digital engagement platform with incentive mechanics; no third-party advertising).

Mission: To institutionalize civic engagement through a transparent, points-based system that rewards socially responsible actions and fosters measurable social impact.

Vision: A globally recognized engagement platform where every act of social contribution—whether by individuals or organizations—is recorded, rewarded, and integrated into a broader ecosystem of trust and equity.

Strategic role within WOSL Group: Cupio Company is the behavioral engine of the WOSL ecosystem. While Phase I entities establish governance, compliance, and narrative infrastructure, Cupio operationalizes participation by incentivizing micro-level actions that aggregate into macro-level impact. It also serves as a gateway for citizens to engage with other WOSL services, including volunteering (Wings of Paloma), ethical commerce (S'agapo Markets), and certification programs.

Primary objectives (next 12–24 months):

- Develop and deploy the Cupio digital platform with GDPR-compliant data architecture and secure identity verification.
- Pilot the points system in two EU Market Areas, integrating with WOSL Core membership databases and WNF for transparency.
- Establish partnerships with local businesses and institutions to convert points into redeemable benefits without compromising ethical standards.
- Implement behavioral analytics to monitor engagement patterns and refine incentive structures.

Funding and sustainability summary: Initial development and operational costs will be financed through WOSL Group allocations and controlled revenue streams from premium features and institutional partnerships. No advertising or third-party data monetization will be permitted.

Key risks and mitigations:

- **Data privacy and security:** GDPR-aligned architecture, encryption, and regular penetration testing.
- **Behavioral manipulation risk:** Transparent algorithmic governance and independent ethics oversight.
- **Adoption barriers:** Targeted onboarding campaigns and integration with existing WOSL services to create immediate utility.

Decision ask: Approval to initiate platform development, secure vendor partnerships for technology build, and authorize pilot deployment in designated EU Market Areas.

2. Organisation Overview

Legal structure and registration: Cupio Company will be incorporated as a Swedish Aktiebolag (AB) with a purpose-driven charter, ensuring compliance with national corporate law while embedding social objectives into its Articles of Association.

Ownership and control: 100% owned by WOSL Group Holding AB, with governance provisions that prevent mission drift and ensure alignment with the Group's social equity mandate.

Governance: A dedicated Board of Directors with expertise in digital platforms, behavioral economics, and data ethics will oversee strategic direction. Governance protocols include quarterly compliance reviews, conflict-of-interest declarations, and adherence to the WOSL Group Code of Conduct.

Geographic scope: Initial operations will focus on EU Market Areas, with scalability provisions for Africa, Asia, and the Americas in Phase III.

Regulatory compliance: Full compliance with GDPR, ePrivacy Directive, and applicable consumer protection laws. Algorithmic transparency and fairness will be monitored in line with emerging EU AI governance frameworks.

Policies: Cupio Company will adopt Group-wide policies on ethics, safeguarding, anti-corruption, and ESG, supplemented by platform-specific policies on data governance, algorithmic accountability, and user rights.

3. Mission and Strategic Alignment

Mission: Cupio Company's mission is to institutionalize civic engagement through a transparent, incentive-based system that rewards socially responsible actions and integrates them into a measurable social equity framework.

Vision: To create a global engagement platform where every act of social contribution—whether volunteering, ethical purchasing, or community participation—is recognized, rewarded, and connected to systemic impact.

Values: Integrity, transparency, inclusivity, and accountability. These values govern both the design of the platform and its operational ethos, ensuring that incentives do not compromise ethical standards or user autonomy.

Alignment with Charity as a Business and Agenda 2074:

Cupio Company operationalizes the Charity as a Business model by converting social responsibility into a structured, auditable practice rather than discretionary philanthropy. It advances Agenda for Social Equity 2074 by embedding equity principles into everyday behavior, thereby creating a distributed mechanism for social redistribution and empowerment. The platform also interfaces with PCGG and PCPP initiatives, reinforcing cooperative governance and participatory economics.

Impact Thesis: By rewarding socially responsible actions through a transparent points system, Cupio Company incentivizes behaviors that generate positive externalities—such as increased volunteerism, ethical consumption, and civic participation. These micro-level actions aggregate into macro-level

outcomes, including enhanced social cohesion, reduced inequality, and strengthened trust in institutional frameworks.

4. Market and Stakeholder Analysis

Sector Overview: The civic engagement and digital incentive sector is experiencing accelerated growth, driven by declining trust in traditional institutions and a societal shift toward participatory governance models. Gamification and behavioral economics are increasingly deployed to influence consumer and citizen behavior, with applications spanning sustainability, health, and education. However, most existing platforms are either ad-driven or lack systemic integration with broader social equity frameworks, creating a gap that Cupio Company is uniquely positioned to fill.

Target Segments:

- **Individuals:** Citizens seeking recognition for socially responsible actions and access to tangible rewards.
- **Organizations:** Businesses and institutions aiming to demonstrate ESG compliance and enhance employee engagement through structured social contribution programs.
- **Public Sector:** Municipalities and agencies seeking scalable tools to promote civic participation and monitor social impact.

Stakeholders:

- **Internal:** WOSL Group entities, particularly Wings of Paloma (volunteering) and S’agapo Markets (ethical commerce).
- **External:** Local businesses, NGOs, educational institutions, and regulatory authorities overseeing data protection and consumer rights.

Competitive and Comparator Landscape: Existing loyalty and reward platforms (e.g., retail loyalty programs) and gamified engagement apps represent indirect competition but lack the normative rigor and systemic integration of Cupio Company. Comparator benchmarks include sustainability-focused apps and civic tech platforms, though these typically operate in isolation rather than as part of a federated ecosystem.

Differentiation: Cupio Company’s differentiation lies in its integration with the WOSL Group’s governance and compliance infrastructure, its ad-free and privacy-preserving design, and its alignment with global social equity objectives. Unlike conventional reward systems, Cupio’s incentives are tied to verifiable social contributions rather than consumption alone, ensuring that engagement translates into measurable societal benefit.

5. Products, Services, and Value Proposition

Core Offerings:

Cupio Company’s primary product is a digital engagement platform that enables individuals and organizations to earn and redeem points for verified socially responsible actions. Core functionalities include:

- **Action Verification Engine:** A compliance-driven module that validates user actions (e.g., volunteering hours, ethical purchases) through API integrations with WOSL entities and partner systems.
- **Points Ledger:** A secure, immutable record of earned points, ensuring transparency and preventing fraud.



- **Redemption Marketplace:** A curated catalog of benefits—such as discounts on ethical products, access to training modules, or recognition badges—aligned with WOSL Group standards.
- **Analytics Dashboard:** Behavioral insights for users and institutional partners, enabling data-driven engagement strategies without compromising privacy.

Service Model:

Cupio operates as a membership-based platform with optional premium tiers for organizations seeking advanced analytics and integration features. Service delivery is digital-first, supported by localized onboarding campaigns in Market Areas.

Value Proposition:

For individuals, Cupio transforms civic engagement into a rewarding, gamified experience that provides tangible benefits without compromising ethical integrity. For organizations, it offers a measurable ESG engagement tool that enhances brand legitimacy and employee participation. For the WOSL ecosystem, Cupio acts as a behavioral catalyst, driving adoption of complementary services such as Wings of Paloma and S’agapo Markets.

Pricing and Access:

The platform will adopt a freemium model for individuals, with premium features for organizations priced on a subscription basis. No advertising or third-party data monetization will be permitted, preserving trust and compliance with GDPR.

Quality Assurance:

Cupio will implement ISO-aligned quality management processes, periodic security audits, and independent ethics reviews to ensure that incentive structures remain transparent, equitable, and resistant to manipulation.

5.1 Branded Consumer Goods Line

In addition to its digital platform, Cupio Company will introduce a line of **budget-oriented consumer goods**—such as socks, snacks, and other everyday essentials—distributed through retail grocery channels. Each product will carry Cupio’s distinctive graphical identity and a clear social impact label indicating the amount allocated to charity per unit sold. This initiative serves three strategic purposes:

1. **Revenue Diversification:** Provides a stable, low-margin but high-volume revenue stream that complements the platform’s digital model.
2. **Brand Visibility:** Embeds the Cupio identity in everyday consumer behavior, reinforcing brand recognition and trust.
3. **Direct Social Impact:** Ensures that a fixed percentage of every purchase is automatically allocated to WOSL Charity programs, creating a transparent and auditable link between consumption and redistribution.

The product line will adhere to strict ethical sourcing and sustainability standards, with supply chain compliance verified through WOSL Trade protocols. Packaging will include QR codes linking to impact dashboards, enabling consumers to verify the cumulative social contribution of their purchases.

6. Operating Model and Capabilities

Organisation Design:

Cupio Company will maintain a dual-track operational structure to manage both its digital engagement platform and its branded consumer goods line. The organization will comprise four core divisions:

- **Technology and Product Development:** Responsible for platform architecture, security, and feature evolution.
- **Engagement and Partnerships:** Focused on user acquisition, institutional partnerships, and redemption ecosystem management.
- **Consumer Goods and Retail Operations:** Oversees product development, supply chain management, retail distribution, and compliance with ethical sourcing standards.
- **Compliance and Ethics:** Ensures adherence to GDPR, consumer protection laws, and WOSL Group governance standards, including ESG and anti-corruption protocols.

Processes:

Key processes include:

- **Digital Platform:** User onboarding, action verification, points allocation, redemption fulfillment, and compliance monitoring.
- **Consumer Goods:** Product design and branding, supplier vetting, production scheduling, logistics coordination, and retail placement. Each product will include traceability features (e.g., QR codes) linking to impact dashboards for transparency.

Technology and Data:

The platform will be built on a modular, API-driven architecture to enable interoperability with WOSL Core, Wings of Paloma, and S'agapo Markets. Data governance will comply with GDPR and emerging EU AI Act provisions, incorporating encryption, anonymization, and algorithmic explainability. For the consumer goods line, supply chain data will be integrated into the platform to provide real-time impact reporting.

Facilities and Assets:

Cupio will operate as a digital-first entity with a central office for governance and compliance functions. For the consumer goods line, strategic partnerships with contract manufacturers and logistics providers will minimize capital intensity while ensuring scalability.

People and Culture:

Initial staffing will prioritize expertise in behavioral economics, data ethics, and platform engineering, complemented by specialists in retail operations, supply chain management, and consumer marketing. A culture of transparency and accountability will be reinforced through mandatory ethics training and performance metrics aligned with social impact objectives.

Partnerships and Vendors:

Strategic partnerships will include:

- **Retail Chains:** For distribution of branded consumer goods.
- **Manufacturers:** For ethical production of budget-oriented items.
- **NGOs and Verification Bodies:** For validating social impact claims.
- **Technology Vendors:** For secure identity management, fraud prevention, and supply chain traceability.



7. Financial Model and Sustainability

Revenue Streams:

Cupio Company's financial model is designed to maintain accessibility for private citizens while ensuring sustainability through diversified revenue sources:

- **Consumer Goods Line:** A fixed amount per unit sold (e.g., €0.05–€0.10) is allocated to WOSL Charity programs, with an additional margin retained to cover Cupio's operational costs.
- **Institutional Partnerships:** Organizations subscribing to premium analytics and integration features will pay a monthly or annual fee.
- **Impact Sponsorships:** Limited, mission-aligned sponsorship opportunities within the WOSL ecosystem, subject to strict governance to preserve independence and transparency.

Cost Structure:

- **Fixed Costs:** Platform development, compliance, governance, and core staffing.
- **Variable Costs:** Retail production, logistics, and redemption fulfillment for the consumer goods line.

Funding Plan:

Initial capital requirements will be met through WOSL Group allocations and internal reserves. No external equity or debt financing is planned during the first 24 months to maintain mission integrity.

Five-Year View (Narrative):

The consumer goods line is expected to achieve breakeven within 18–24 months, driven by high-volume, low-margin sales. Platform adoption will scale progressively, with institutional subscriptions contributing to revenue stability. By Year 5, Cupio aims to achieve a balanced revenue mix: 60% consumer goods, 30% institutional subscriptions, and 10% ecosystem sponsorships.

Controls:

Centralized treasury oversight, quarterly financial audits, and compliance with IFRS standards will ensure financial discipline and transparency.

8. Risk Management

Key Risks:

- **Regulatory Risk:** Non-compliance with GDPR, consumer protection laws, or labeling requirements for retail products.
- **Operational Risk:** Supply chain disruptions affecting consumer goods availability.
- **Reputational Risk:** Perceived conflicts of interest or misuse of incentive structures.
- **Technology Risk:** Data breaches or algorithmic bias in points allocation.

Mitigation Strategies:

- **Regulatory Compliance:** Continuous legal monitoring, external counsel engagement, and certification under relevant EU standards.
- **Supply Chain Assurance:** Multi-vendor sourcing, ethical procurement audits, and contingency stock planning.
- **Reputation Management:** Transparent governance, independent ethics oversight, and proactive stakeholder communication.
- **Technology Safeguards:** End-to-end encryption, regular penetration testing, and algorithmic fairness audits.

Risk Governance:

A consolidated risk register will be maintained, with quarterly reviews by the Cupio Board and escalation protocols to the WOSL Group Risk Committee.

9. SWOT Analysis — Narrative

Strengths:

Cupio Company's primary strength lies in its dual-track model, combining a GDPR-compliant digital engagement platform with a branded consumer goods line that embeds social impact into everyday consumption. This hybrid approach creates diversified revenue streams and reinforces brand visibility. Integration within the WOSL Group ecosystem provides immediate legitimacy, access to a pre-existing compliance framework, and synergies with entities such as Wings of Paloma and S'agapo Markets. The ad-free, privacy-preserving design further differentiates Cupio from conventional engagement platforms, aligning with growing consumer demand for ethical digital services.

Weaknesses:

The model's complexity introduces operational challenges, particularly in managing two distinct business lines—digital engagement and retail consumer goods—under a unified governance structure. Initial capital intensity for platform development and retail distribution may strain resources during the early growth phase. Furthermore, the absence of advertising revenue, while strategically intentional, limits financial flexibility and places greater reliance on volume-driven consumer goods sales and institutional subscriptions.

Opportunities:

Macro trends favor Cupio's value proposition. Rising demand for ESG-aligned consumer products, combined with the proliferation of gamified engagement models, creates fertile ground for adoption. Regulatory momentum in the EU toward algorithmic transparency and ethical AI positions Cupio as a first mover in compliance-driven engagement platforms. Expansion into emerging markets through WOSL's continental hubs offers long-term scalability, while partnerships with retailers and NGOs can accelerate brand penetration and social impact.

Threats:

Competitive threats include established loyalty programs and civic engagement apps that may pivot toward ESG positioning. Regulatory risk remains material, particularly under evolving EU frameworks such as the AI Act and Digital Services Act, which impose stringent obligations on algorithmic governance and data protection. Supply chain disruptions or reputational incidents—such as perceived greenwashing or misuse of incentive structures—could erode trust and undermine adoption. Additionally, consumer fatigue with gamification models poses a latent behavioral risk.

Strategic Implications:

To leverage strengths and opportunities, Cupio must prioritize operational excellence in both digital and retail domains while maintaining uncompromising compliance standards. Weaknesses can be mitigated through phased scaling and strategic partnerships that reduce capital intensity. Threats require proactive regulatory monitoring, robust ethics oversight, and transparent communication to sustain trust and legitimacy.



Strengths	Weaknesses
Integration within WOSL Group ecosystem ensures legitimacy and compliance.	Dual-track model (digital + retail) increases operational complexity.
Ad-free, privacy-preserving platform aligned with GDPR and ethical standards.	Initial capital intensity for platform and retail distribution.
Diversified revenue streams (consumer goods + institutional subscriptions).	Reliance on high-volume, low-margin retail sales for sustainability.

Opportunities	Threats
Rising demand for ESG-aligned products and ethical engagement platforms.	Regulatory tightening under EU AI Act and Digital Services Act.
Expansion potential through WOSL's continental hubs and Market Areas.	Competitive pressure from loyalty programs and civic tech platforms.
Partnerships with retailers and NGOs to accelerate adoption and visibility.	Supply chain disruptions or reputational risks (e.g., greenwashing claims).

Political	Economic	Social	Technological	Environmental	Legal
EU digital governance frameworks (DSA, AI Act) impose compliance obligations.	Inflationary pressures may affect consumer spending on discretionary goods.	Growing demand for ethical consumption and civic engagement platforms.	Rapid adoption of AI and gamification in engagement platforms.	Rising consumer preference for sustainable and ethically sourced products.	GDPR and ePrivacy Directive mandate strict data governance and user consent.
Public policy incentives for ESG and social innovation.	Retail sector volatility and supply chain cost fluctuations.	Increased skepticism toward ad-driven platforms enhances	Need for algorithmic transparency and explainability	Regulatory push for circular economy and reduced	Consumer protection laws governing labeling and claims for

Opportunities				Threats	
		Cupio's positioning.	under EU AI regulations.	packaging waste.	social impact.

10. PESTEL Analysis

Political:

The EU's regulatory environment is increasingly favorable to platforms that prioritize transparency, ethical governance, and social impact. Frameworks such as the Digital Services Act (DSA) and the forthcoming AI Act impose obligations on algorithmic accountability and user protection, which Cupio is structurally designed to meet. Public policy incentives for ESG innovation further reinforce the strategic viability of Cupio's model.

Economic:

Macroeconomic volatility, including inflationary pressures and supply chain disruptions, may affect consumer purchasing power and retail margins. However, the low-cost, high-volume nature of Cupio's consumer goods line mitigates this risk by targeting essential items with minimal price elasticity. Institutional subscriptions provide an additional buffer against retail sector fluctuations.

Social:

Societal trends strongly favor Cupio's value proposition. There is a marked increase in consumer demand for ethical products and platforms that enable meaningful civic engagement. Simultaneously, declining trust in ad-driven digital ecosystems creates an opportunity for Cupio's ad-free, privacy-preserving model to gain traction.

Technological:

The rapid evolution of AI and gamification technologies presents both opportunities and compliance challenges. Cupio's architecture incorporates algorithmic transparency and fairness audits to align with emerging EU AI governance norms. Interoperability with WOSL Group systems and external partners ensures scalability and resilience.

Environmental:

Consumer expectations for sustainability and regulatory mandates for circular economy practices necessitate rigorous environmental standards in Cupio's consumer goods line. Ethical sourcing, minimal packaging, and transparent impact reporting will be embedded into the supply chain to maintain compliance and brand integrity.

Legal:

Compliance with GDPR and the ePrivacy Directive is non-negotiable, requiring robust data governance, explicit consent mechanisms, and secure identity verification. Consumer protection laws governing labeling and social impact claims impose additional obligations, particularly for the retail product line. Cupio will implement a proactive legal monitoring system to ensure continuous compliance across jurisdictions.

11. Implementation Roadmap

Horizon 1 (0–6 months):

- Finalize platform architecture and initiate development with GDPR-compliant data structures.
- Design and approve branding for the consumer goods line, including packaging and impact labeling.
- Secure initial retail partnerships for distribution of branded products in two EU Market Areas.
- Establish governance protocols, ethics oversight committee, and compliance manuals.

Horizon 2 (6–18 months):

- Launch beta version of the Cupio platform in pilot Market Areas, integrated with WOSL Core and Wings of Paloma.
- Roll out first wave of consumer goods in retail channels, supported by marketing campaigns emphasizing social impact.
- Onboard institutional partners for premium analytics and ESG engagement features.
- Implement behavioral analytics and refine incentive algorithms based on pilot data.

Horizon 3 (18–36 months):

- Scale platform to additional EU Market Areas and prepare for Africa and Asia expansion.
- Expand consumer goods portfolio to include additional budget-oriented items with verified ethical sourcing.
- Integrate redemption marketplace with S’agapo Markets for seamless cross-platform engagement.
- Formalize international supply chain agreements and implement advanced traceability systems.

Dependencies include timely completion of platform development, regulatory approvals for consumer goods labeling, and successful onboarding of retail partners. Critical milestones will be tracked through a centralized project management dashboard with quarterly review gates.

12. Monitoring, Evaluation, and Learning (MEL)

KPIs:

- **Engagement Metrics:** Active users, verified actions, and points redeemed.
- **Impact Metrics:** Total funds allocated to WOSL Charity from consumer goods sales; number of social programs funded.
- **Financial Metrics:** Revenue from consumer goods and institutional subscriptions; cost-to-revenue ratio.
- **Compliance Metrics:** GDPR audit results, supply chain verification scores, and ethics review outcomes.

Data Model:

Cupio will implement a secure, cloud-based data architecture with role-based access controls and anonymization protocols. Data retention policies will comply with GDPR and WOSL Group standards.

MEL Cycle:

- **Baseline:** Established during pilot phase with initial user and sales data.
- **Targets:** Defined for each KPI on an annual basis, aligned with WOSL Group strategic objectives.
- **Reviews:** Quarterly performance reviews and annual impact evaluations, incorporating adaptive management principles.

Assurance:

Independent audits will be conducted annually, supplemented by external evaluations of social impact

claims. Transparency reports will be published semi-annually, detailing performance against KPIs and compliance obligations.

13. Holistic Relevance and Ecosystem Contribution

Cupio Company is not an isolated initiative; it is a structural enabler within the WOSL Group's integrated social economy. Its primary contribution lies in operationalizing behavioral incentives that drive engagement across the Group's ecosystem. By rewarding socially responsible actions, Cupio creates a continuous feedback loop that amplifies the impact of other WOSL entities:

- **Synergies with Wings of Paloma:** Verified volunteer hours feed directly into Cupio's points system, incentivizing civic participation and strengthening community networks.
- **Integration with S'agapo Markets:** Points earned through Cupio can be redeemed for ethical products, reinforcing sustainable consumption patterns and supporting fair-value commerce.
- **Interface with WOSL Core and Charity:** Certification data and redistribution metrics are linked to Cupio's engagement dashboards, ensuring transparency and traceability of social impact.
- **Amplification through World News Flash:** Verified actions and impact stories are documented and disseminated, reinforcing trust and public accountability.

Cupio's consumer goods line further embeds the WOSL identity into everyday life, transforming routine purchases into acts of social contribution. This dual-channel approach—digital engagement and physical product presence—positions Cupio as a behavioral catalyst within the Group's holistic architecture.

14. Geographic Structure and Market Area Strategy

Cupio Company will adopt the WOSL Group's multi-tiered geographic framework to ensure global scalability while maintaining local relevance:

- **Continental Hubs:** Initial deployment will focus on the EU hub, leveraging regulatory alignment and mature retail infrastructure. Subsequent phases will target Africa and Asia, where civic engagement and ethical consumption trends are accelerating.
- **National and Regional Layers:** Within each continent, Cupio will establish national partnerships with retail chains and local institutions to facilitate distribution of consumer goods and onboarding of platform users.
- **Market Areas:** At the most granular level, Cupio will integrate with WOSL Market Areas, ensuring that engagement incentives are context-specific and aligned with local social priorities. Market Area dashboards will provide real-time visibility into participation rates, impact metrics, and redemption patterns.

Scalability will be supported by a modular technology stack and a distributed supply chain model, enabling rapid replication without structural disruption. Governance at each layer will adhere to WOSL Group standards, ensuring consistency in compliance, ethics, and brand integrity.

15. Compliance, Ethics, and Safeguarding

Cupio Company operates under a governance framework that prioritizes legal compliance, ethical integrity, and the safeguarding of all stakeholders. The following standards and protocols will apply:

Ethics and Conduct:

Cupio adopts the WOSL Group Code of Conduct, which mandates transparency, accountability, and zero tolerance for corruption or conflicts of interest. All employees and partners will undergo mandatory ethics training, with annual certifications to ensure adherence.

Safeguarding:

Policies will be implemented to protect vulnerable individuals, particularly in volunteer engagement contexts linked to Wings of Paloma. This includes background checks for institutional partners, clear reporting channels for misconduct, and alignment with international safeguarding standards.

Data Protection and Privacy:

Cupio will maintain full compliance with the General Data Protection Regulation (GDPR) and the ePrivacy Directive. Key measures include:

- Explicit consent mechanisms for all data processing activities.
- Data minimization and anonymization protocols.
- Regular Data Protection Impact Assessments (DPIAs).
- Appointment of a Data Protection Officer (DPO) with direct reporting to the Board.

Algorithmic Governance:

Given the platform's reliance on behavioral incentives, Cupio will implement algorithmic transparency measures, including fairness audits and explainability protocols, in line with the forthcoming EU AI Act.

ESG and Sustainability:

Cupio's consumer goods line will comply with EU environmental directives, including packaging waste reduction and ethical sourcing requirements. ESG performance will be disclosed in annual sustainability reports, subject to third-party assurance.

16. Appendices

A. Glossary: Definitions of key terms such as "Market Area," "Impact Dashboard," and "Behavioral Incentive Model."

B. Assumptions and Calculation Notes: Basis for financial projections, including unit economics for consumer goods and subscription pricing models.

C. KPI Dictionary: Detailed definitions and calculation methods for engagement, impact, and compliance metrics.

D. Policy Register: Comprehensive list of internal policies, including Data Protection, Ethics, Safeguarding, and ESG.

E. Evidence Base and References: Regulatory frameworks (GDPR, DSA, AI Act), academic literature on behavioral economics and civic engagement, and WOSL Group governance documents.

F. Risk Register (Detailed): Expanded version of Chapter 8, including risk owners, thresholds, and contingency plans.

Final Word

Cupio Company is designed to translate social equity from principle into practice. By combining a GDPR-compliant engagement platform with a modest, high-volume consumer goods line, the model aligns everyday behavior with measurable public benefit and embeds accountability into both digital



and physical channels. The incentives, data structures, and governance protocols are deliberately conservative, privileging legality, auditability, and ethical clarity over growth by experimentation.

Phase I of the WOSL Group has established the governance spine, compliance perimeter, and narrative transparency required for credible scale. Cupio Company is the behavioral engine that activates this infrastructure at citizen level, while maintaining the same standards that earned the Group's license to operate. Points are earned only for verified actions. Impact allocations from retail sales are fixed, labeled, and auditable. Data is processed on the narrowest lawful basis, with algorithmic decisions subject to explanation and review. These are not features; they are obligations.

The pathway to execution is sequenced and proportionate. Pilots in selected EU Market Areas will validate technical integration, retail logistics, and ethics oversight under real conditions. Independent assurance and transparent reporting will test not only operational readiness but also the durability of the trust on which the model depends. Where tensions arise—between incentive strength and manipulation risk, between consumer price sensitivity and charitable allocation, or between rapid scale and governance capacity—Cupio will choose the side of integrity and adjust growth accordingly.

Approval to proceed authorizes the Company to finalize build, initiate pilots, and conclude retail and verification agreements under the controls set out in this plan. Success will be evidenced not by reach alone, but by the consistency with which contribution is verified, impact is delivered, and rights are protected. In that discipline lies the credibility of Cupio Company and, by extension, the legitimacy of the WOSL Group's