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# S'AGAPO MARKETS BUSINESS PLAN

*A GLOBAL AND OPEN MARKET FOR THE SMALL BUSINESS OWNER*

**CREATED BY**

EUSL AB

*Care to Change the World*



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# S'agapo Markets - Business Plan

## 1. Executive Summary

S'agapo Markets is the WOSL Group's members-only marketplace for both products and services, designed to provide a compliant, transparent, and high-trust trading environment that privileges verified traders and clustered categories over undifferentiated listings. The marketplace architecture is informed by two principles: first, that category clustering and curated proximity increase discovery, conversion, and network utility; and second, that services and goods can coexist under one governance perimeter when obligations for trader traceability, consumer information, and product/service safety are enforced consistently. The model is commission-based with an option to process payments via Growthify; it avoids third-party advertising conflicts and prioritizes lawful data practices and marketplace integrity. Evidence from platform economics supports the commercial rationale for clustering and two-sided network effects in driving participation and liquidity.

**Nature of the entity:** Purpose-driven AB (online intermediation service/marketplace for members; commission-based; optional payment service provider (PSP) integration).

**Mission:** To operate a compliant, trusted marketplace for members to sell goods and services under clear standards, transparent fees, and strong trader-and-consumer protections.

**Vision:** A scaled, pan-regional marketplace that matches the convenience of leading platforms while preserving governance discipline, lawful data processing, and measurable social equity contributions.

**Strategic role within WOSL Group:** S'agapo Markets is the commercial engine for members' trade in goods and services, integrated with WOSL Trade for compliance interfaces and with Cupio/Wings of Paloma for incentive and engagement flows; WNF provides transparent documentation of marketplace impact and trader stories.

### **Primary objectives (next 12–24 months):**

- Launch the EU reference marketplace with **Know-Your-Business-Customer (KYBC)** onboarding of traders, notice-and-action procedures, and traceability features consistent with the **Digital Services Act (DSA)**.
- Implement product safety controls and authority-cooperation workflows aligned with the **General Product Safety Regulation (EU) 2023/988 (GPSR)** ahead of full applicability in the EU.
- Roll out transparent ranking disclosures for business users in compliance with the **Platform-to-Business (P2B) Regulation (EU) 2019/1150**.
- Configure PSP integration under **PSD2** and in view of the **PSD3/PSR** reform package, including strong customer authentication and fraud controls.
- Establish VAT compliance for cross-border B2C, including **OSS/IOSS** and deemed-supplier scenarios where applicable.

**Funding and sustainability summary:** Operating expenditure is covered by a small **commission on each sale**, optional PSP-related fees, and premium seller services. The model assumes no advertising income, preserving ranking integrity and regulatory simplicity under DSA/P2B.

### **Key risks and mitigations (high level):**



- **Regulatory risk:** Marketplace-specific DSA duties (KYBC, notice-and-action, transparency reporting) and GPSR safety obligations mitigated through codified processes, randomized checks, and authority-cooperation channels.
- **Consumer law risk:** Omnibus-Directive updates to information duties (e.g., trader status, review transparency, pricing practices) embedded in UI and seller terms.
- **Payments & fraud risk:** SCA, transaction monitoring, and reconciliation controls aligned with PSD2 and the forthcoming PSD3/PSR.
- **Tax compliance risk:** Deemed-supplier and VAT reporting mitigated via automated tax logic and IOSS/OSS enrollment where applicable.

**Success benchmark:** Gross merchandise value and commission revenue trajectory calibrated to 5% of Amazon’s annual net sales as disclosed in its most recent Form 10-K; this external yardstick is used for internal ambition-setting and investor communication.

**Decision ask:** Approval to (i) finalize the DSA/GPSR/P2B-aligned governance manuals; (ii) implement EU reference launch with Growthify (optional) PSP integration; (iii) execute first-year trader acquisition and category-clustering plan.

## 2. Organisation Overview

**Legal structure and registration:** S’agapo Markets will be incorporated as a Swedish Aktiebolag (AB) under WOSL Group Holding, operating EU-wide as an online intermediation service (marketplace) with cross-border expansion via freedom to provide services and, where relevant, establishment under the Services Directive 2006/123/EC.

**Ownership and control:** 100% owned by WOSL Group Holding AB, with protective provisions in the Articles to maintain the public-interest orientation, ranking transparency, and separation between commercial incentives and compliance functions, consistent with **P2B** expectations on fair treatment and ranking disclosures for business users.

### Governance:

– **Board:** Independent expertise in marketplace operations, consumer and product safety, payments, tax/VAT, and data protection.

### – Policies and manuals:

- **DSA:** KYBC onboarding (Article 30-type trader traceability), notice-and-action workflow, transparency reporting where applicable, and “trusted flagger” cooperation.
- **GPSR:** Marketplace safety contact points, Safety Gate registration, internal product-safety processes, and authority cooperation for dangerous product offers.
- **Omnibus/Consumer acquis:** Trader status disclosures, review transparency, pricing and discount rules integrated into seller UX and T&Cs.
- **P2B:** T&Cs to state ranking parameters and their relative importance; accessible dispute-resolution pathways for business users.
- **VAT:** OSS/IOSS configurations and deemed-supplier logic for certain consignments.
- **Payments:** PSD2-compliant SCA and fraud controls; monitoring of **PSD3/PSR** evolution.



**Geographic scope:** EU reference jurisdiction first (single market advantages for services and e-commerce), with subsequent replication to Africa, Asia, and the Americas through WOSL's continental hubs and national Market Areas; services scope leverages the EU internal market framework for services to enable cross-border provision.

**Regulatory compliance perimeter:**

- **Digital platform duties:** DSA obligations applicable to online marketplaces (KYBC, notice-and-action, trader traceability, and transparency).
- **Product safety:** GPSR obligations for marketplace providers, including Safety Gate cooperation and dangerous product takedowns.
- **Consumer law:** Omnibus-updated rights on price reductions, reviews, identity of the contracting party, and digital content/services disclosures.
- **B2B fairness:** P2B ranking-transparency and dispute-handling.
- **Payments:** PSD2/instant-payments and forthcoming PSD3/PSR framework for PSPs and e-money; SCA by design.
- **Taxation:** OSS/IOSS registration and deemed-supplier VAT responsibilities where S'agapo is considered to "facilitate" relevant B2C supplies.

**Policies:** Code of Conduct (anti-corruption, conflicts, gift/benefit rules), Data Protection (GDPR), Product Safety & Recall, Seller Disclosure & Reviews, Pricing & Promotions, Ranking Transparency & Fairness, Payments & Fraud, and VAT Compliance. Where services are offered through the marketplace (e.g., consulting, repairs), trader onboarding and information duties are aligned with the **Services Directive** and the consumer acquis for digital services.

**Operating interfaces:** S'agapo Markets will maintain formal interface agreements with WOSL Trade (trade and compliance data exchange), WNF (marketplace transparency reporting), and Cupio (engagement incentives where appropriate). Category-clustering will be codified in catalog governance to exploit economies of scope in discovery while avoiding discriminatory self-preferencing; clustering as a design choice is grounded in platform network-effects literature.

### 3. Mission and Strategic Alignment

**Mission.** S'agapo Markets' mission is to operate a lawful, trusted, and data-protective marketplace where WOSL members trade **both products and services** under transparent rules, proportionate fees, and verifiable protections for traders and consumers.

**Vision.** To become the reference members-only marketplace in each WOSL Market Area, matching incumbent convenience while maintaining a compliance-by-design posture and measurable contributions to social equity.

**Values.** Legality, transparency, proportionality, and service to the public interest. These values are codified in governance manuals and embedded in product and operations.

**Strategic alignment.** The marketplace is designed around five alignment vectors.

1. **Compliance by design for online marketplaces.** S'agapo implements trader traceability and **Know-Your-Business-Customer (KYBC)** onboarding, structured notice-and-action procedures, and transparency measures required of online platforms under the **Digital**



**Services Act (DSA)**; operational playbooks cover random checks and authority cooperation as contemplated for platforms enabling distance contracts.

In parallel, product-safety workflows (safety contact points, Safety Gate registration, and dangerous-product takedowns) are prepared to meet the **General Product Safety Regulation (EU) 2023/988 (GPSR)** marketplace obligations as they apply across the Union.

2. **Fair intermediation and ranking transparency.** Terms for business users specify the main ranking parameters and their relative importance, with accessible complaint handling, in line with the **Platform-to-Business Regulation (EU) 2019/1150** and the European Commission's ranking-transparency guidance.
3. **Dual-market scope (goods and services) within the internal market.** Because members also sell services, S'agapo aligns cross-border provision and establishment practices with the **Services Directive 2006/123/EC**, ensuring non-discriminatory access and electronic procedures while observing sectoral exclusions and national implementations.
4. **Payments and taxation readiness.** Where members elect to use Growthify for payments, strong customer authentication and transaction monitoring follow **PSD2**, with continuous monitoring of the **PSD3/PSR** package; VAT is configured for cross-border B2C via **OSS/IOSS** and, where the platform is deemed to "facilitate" certain supplies, **deemed-supplier** logic is applied.
5. **Network design and clustering.** Category clustering and curated proximity are adopted as design choices to enhance discovery, liquidity, and conversion on a two-sided platform; this approach is supported by platform-economics literature on two-sided markets and by analyses of **cluster markets** and network effects in digital intermediation.

**Interface with WOSL Group.** S'agapo integrates with WOSL Trade (compliance and cross-border trade interfaces), with Cupio (optional engagement incentives), and with WNF (marketplace transparency and public-interest reporting). This configuration aligns operationally with the Group's governance and social-equity agenda while preserving the marketplace's neutrality toward sellers.

**Success benchmark.** For external framing, S'agapo tracks progress against an ambition equal to **five percent of Amazon's annual net sales**, using the company's most recent **Form 10-K** as the public benchmark for scale.

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## 4. Market and Stakeholder Analysis

**Sector overview.** EU online commerce remains extensive: in **2024, 77% of EU internet users (aged 16–74) bought goods or services online**, underscoring deep demand for compliant, discovery-efficient marketplaces.

Despite inflationary pressure and regulatory adaptation, **European B2C e-commerce turnover was estimated at €887 billion in 2023** (up from €864 billion in 2022), with notable regional disparities and continued competitive pressure from non-EU platforms—conditions that elevate the value of trusted, EU-compliant intermediaries.

Marketplace formats account for a growing share of digital trade across sectors, with multi-category incumbents (e.g., Amazon, eBay) and vertical specialists (e.g., fashion recommerce, DIY) shaping buyer expectations for convenience, reliability, and dispute handling; independent analyses track comparative marketplace performance across Europe and confirm the centrality of marketplaces in the digital channel mix.

**Demand characteristics for S’agapo.** Members require a trading venue that: (i) permits **goods and services** listings under one compliance perimeter, (ii) offers lawful payments and VAT treatment for cross-border sales, and (iii) maintains transparent ranking and review policies that meet the **Omnibus Directive** updates to EU consumer law (identity disclosures, review authenticity messaging, and pricing practices).

From the consumer side, the combination of marketplace convenience with credible moderation of illegal offers and unsafe products is material to trust and repeat usage under **DSA** and **GPSR** expectations.

### Stakeholders.

— **Member-sellers (goods and services).** Onboarded via KYBC with clear VAT settings (OSS/IOSS) and P2B-compliant ranking disclosures; benefits include curated clustering, predictable fees, dispute pathways, and access to a members-only buyer base.



— **Member-buyers.** Protected by GPSR-driven safety processes for products and Omnibus-aligned information duties (e.g., trader status, review authenticity statements), plus standardized complaint handling.

— **Public authorities.** Engage through Safety Gate and notice-and-action channels; benefit from traceability and takedown cooperation under DSA/GPSR.

— **Payment and logistics partners.** PSP integration follows PSD2/instant-payments guidance and tracks PSD3/PSR reforms; logistics partners align with product-safety and returns obligations communicated through seller policies.

— **Consumer advocates and standard setters.** S’agapo’s approach to reviews and transparency aligns with the Omnibus framework and responds to civil-society calls to improve reliability of online reviews and enforce the existing *acquis* consistently across Member States.

**Competitive and comparator landscape.** Incumbent multi-sector marketplaces possess scale advantages and extensive logistics networks; however, their size also entails complex advertising, ranking, and data-processing models. Public filings illustrate the magnitude and diversification of such platforms, underscoring the importance of a differentiated proposition for a member-governed marketplace.

S’agapo’s differentiation rests on four tenets: (i) members-only access and curation, (ii) goods-and-services coverage under one governance perimeter rooted in the Services Directive and consumer *acquis*, (iii) ad-free ranking with transparent parameters consistent with P2B, and (iv) category clustering informed by two-sided market design to intensify discovery without self-preferencing.

Risk and opportunity outlook. Regulatory “implementation years” under DSA/GPSR and Omnibus will reward platforms that operationalize transparency, safety, and authenticity at scale; conversely, gaps in KYBC, safety, or review governance can trigger enforcement and reputational harm.

High adoption of e-commerce across the EU, together with the structural prominence of marketplace formats, provides a large addressable base for a compliant, curated, and members-only marketplace with integrated services.

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## 5. Products, Services, and Value Proposition

S'agapo Markets operates a members-only marketplace where goods and services are listed, discovered, contracted, fulfilled, and—where applicable—returned under a single governance perimeter. The marketplace is designed around curated category clustering and proximity logic to intensify discovery and conversion while preserving neutrality. The clustering design choice is grounded in platform-economics literature on two-sided markets and cluster markets, which links curated scope and proximity to higher user utility and liquidity on digital platforms.

On the products side, the listing lifecycle requires trader traceability at onboarding (Know-Your-Business-Customer, KYBC), product-safety attestations, and the provision of accurate pre-contractual information. KYBC and traceability are implemented to satisfy marketplace-specific duties under the Digital Services Act (DSA), including structured notice-and-action procedures and cooperation with authorities. Product-safety processes—safety contact points, Safety Gate registration, and takedown of dangerous offers—are configured to meet the General Product Safety Regulation (EU) 2023/988 (GPSR) obligations for online marketplace providers as they become fully applicable across the Union.

On the services side, S'agapo enables members to offer services (e.g., installation, consulting, repairs) cross-border within the EU's internal market. The marketplace aligns trader information duties and access to electronic procedures with the Services Directive 2006/123/EC, observing sectoral exclusions and national implementations to ensure non-discriminatory conditions for establishment and the free movement of services.

The payments layer supports card and account-to-account options with Growthify offered as an optional PSP. Strong customer authentication (SCA), fraud monitoring, and safeguarding standards follow PSD2, with continuous monitoring of the Commission's proposals for PSD3 and the Payment Services Regulation (PSR) to maintain forward compatibility. Cross-border B2C VAT is automated via OSS/IOSS, and where S'agapo is deemed to “facilitate” certain supplies, the platform applies deemed-supplier logic that transfers VAT collection and remittance duties to the marketplace.

To maintain fair intermediation, business-user terms set out the main ranking parameters and their relative importance, together with accessible business complaint handling, consistent with the Platform-to-Business Regulation (EU) 2019/1150 and the Commission's ranking-transparency guidance. This framework is complemented by Omnibus-Directive updates to the EU consumer acquis on identity disclosures, price-reduction rules, and review authenticity messaging; S'agapo's review presentation policies therefore disclose whether and how review authenticity is checked, avoiding misleading practices.

The value proposition is explicit. For sellers, S'agapo provides a curated, compliant channel with predictable commissions, cross-border VAT handling, and transparent ranking—benefits that are non-trivial given the increasing enforcement of DSA/GPSR/Omnibus duties in the EU. For buyers, the marketplace offers a unified venue to purchase goods and book services with safety and identity assurances aligned to EU rules, supported by notice-and-action and recall/takedown cooperation where necessary. For the WOSL ecosystem, S'agapo interlocks with WOSL Trade (compliance and cross-border interfaces), Cupio (optional engagement incentives), and WNF (public-interest transparency on marketplace performance).

## 6. Operating Model and Capabilities

The operating model translates the legal and commercial design into repeatable processes, interoperable systems, and proportionate controls. Governance is centralized at the S'agapo Markets AB level while execution is distributed through Market Areas under harmonized manuals for onboarding, listing, moderation, payments, taxation, and reporting. The trader-onboarding process collects and verifies identity, legal status, and payment-account details before activation, applying DSA-aligned KYBC checks and creating a traceable audit trail; activation is contingent on acceptance of P2B-compliant terms that disclose ranking parameters and dispute pathways.

Listing and moderation processes differentiate goods from services while keeping a common safety and information baseline. Goods listings require safety attestations and documentation to support GPSR obligations; S'agapo maintains safety contact points and cooperates with authorities—including prompt removal or disabling of access to dangerous-product offers and identical copies—consistent with the GPSR's marketplace duties. For services, the marketplace enforces identity and information duties and supports electronic procedures in line with the Services Directive's internal-market facilitation. Notice-and-action is operated as a measured workflow with standardized intake, assessment, action, and communication steps, consistent with DSA expectations for online platforms.

The payments and reconciliation stack implements SCA and fraud screening for card and A2A rails under PSD2 and anticipates PSD3/PSR adjustments to authorization, data access, and anti-fraud frameworks. Settlement files reconcile PSP reports with order states; chargebacks and refunds follow documented SOPs that reflect consumer-law withdrawal and remedy rights in the EU. Cross-border VAT records are generated with OSS/IOSS schemas, and where S'agapo is deemed supplier, the system posts the two-step VAT transactions mandated by the 2021 e-commerce package.

Data and systems are architected to meet GDPR principles—lawfulness, transparency, purpose limitation, data minimization, integrity/confidentiality—and to support data subject rights through verifiable workflows. Data protection by design and by default (Article 25) is implemented in identity, profiling/ranking, and review systems; records of processing and DPIAs are maintained for higher-risk features (e.g., fraud models, review-authenticity checks).

S'agapo's ranking transparency is not a one-off disclosure but an operational capability: parameter inventories are maintained; change logs are versioned; and business-user communications are synchronized with release notes, supporting the enforceability of the P2B regime and reducing dispute burden. Reviews are handled under Omnibus-updated UCPD rules—messaging makes clear whether and how authenticity is verified; unverifiable claims (e.g., “verified purchase”) are not displayed.

People and partnerships emphasize compliance, marketplace operations, and engineering. Core roles include compliance counsel (DSA/GPSR/consumer law), tax/VAT operations (OSS/IOSS/deemed supplier), payments risk (PSD2→PSD3/PSR), and data protection (DPO per GDPR). External interfaces include competent authorities (DSA/GPSR cooperation), PSPs (SCA/fraud and settlement), and logistics partners for returns and recalls. This distribution of capabilities reflects the Commission's objective to make platforms safe and accountable while enabling EU-wide market access for business users.

Finally, assurance is embedded: internal audit performs periodic reviews of KYBC completeness, notice-and-action timeliness, Safety Gate interactions, VAT postings, and GDPR control effectiveness; findings are tracked to closure. The resulting evidence base supports transparency reporting where applicable and reduces exposure to sanctions under the EU's evolving platform and consumer-safety framework.



**1. GDPR in the Media: A Guide – NumberAnalytics**

<https://www.numberanalytics.com/blog/gdpr-in-media-guide>

**2. GDPR for Media and Publishing: Balancing Content Creation and Data Privacy – GDPR Advisor**

<https://www.gdpr-advisor.com/gdpr-for-media-and-publishing-balancing-content-creation-and-data-privacy/>

**3. EU Regulation of Charitable Organisations: The Politics of Legally Enabling Civil Society – UCD Research Repository**

<https://researchrepository.ucd.ie/server/api/core/bitstreams/9e739ab3-3df0-4576-b3b0-16e6110bad4c/content>

**4. SEI Insights: Data Compliance for Media Companies – SEI**

<https://www.sei.com/insights/>

**5. Embedding sustainability into corporate strategy and decision-making – Ramboll**

<https://www.ramboll.com/insights/decarbonise-for-net-zero/embedding-sustainability-into-corporate-strategy-and-decision-making>

**6. Fiduciary Principles in European Civil Law Systems – ECGI**

<https://www.ecgi.global/publications/working-papers/fiduciary-principles-in-european-civil-law-systems>

**7. An introduction to the Charities Governance Code – Grant Thornton**

<https://www.grantthornton.ie/globalassets/1.-member-firms/ireland/images/documents/grant-thornton---charities-governance-code.pdf>

**8. Regulation (EU) 2023/988 on general product safety: An overview of key developments – Soulier Avocats**

<https://www.soulier-avocats.com/en/regulation-eu-2023-988-on-general-product-safety-an-overview-of-key-developments/>

**9. EU Regulation on General Product Safety (2023/988) – GOV.UK**

<https://www.gov.uk/government/publications/eu-regulation-2023988-on-general-product-safety/eu-regulation-on-general-product-safety-2023988>

**10. Embedding ESG and purpose in your organization – McKinsey**

<https://www.mckinsey.com/capabilities/strategy-and-corporate-finance/our-insights/the-role-of-esg-and-purpose>

**11. Network Effects and Market Power – Boston University**

<https://sites.bu.edu/tpri/files/2021/09/Network-Effects-and-Market-Power.pdf>

**12. Regulation (EU) 2016/679 – GDPR – EUR-Lex**

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>

**13. Regulating European Philanthropy: Lessons from the Scholarly Legacy – De Gruyter Brill**

<https://www.degruyter.com/document/doi/10.1515/9783110762558-010/html>

**14. GDPR-Text.com – Full GDPR Text**

<https://gdpr-text.com/>





## **15. Regulation (EU) 2016/679 of the European Parliament and of the Council – WIPO**

<https://www.wipo.int/wipolex/en/text/445667>

## **16. The EU General Data Protection Regulation – IAPP**

<https://iapp.org/resources/article/eu-general-data-protection-regulation-gdpr-resource-center/>

# **8. Go-to-Market and Network Growth**

This chapter assumes that Chapter 8 in your template addresses go-to-market strategy and network growth. If your Chapter 8 heading differs, I will transpose the content accordingly without changing substance or tone.

## **8.1 Market Positioning and Value Proposition**

S'agapo Markets positions itself as an EU-lawful, safety-led, multi-category marketplace that privileges trust, provenance, and transparent curation over indiscriminate scale. The commercial thesis is that durable growth in a two-sided marketplace is accelerated when compliance and consumer protection are native to the product and to communications, thereby reducing friction, refunds, and regulatory exposure while improving conversion and repeat usage. In operational terms, this means: ranking transparency for business users (P2B), recommender transparency and advertising labelling for consumers (DSA), disciplined treatment of promotions (Omnibus/PID), and channel execution that respects GDPR and the ePrivacy Directive. These are not add-ons but growth levers, because they support credible differentiation, lower customer-acquisition costs over time, and enable cross-border scaling under harmonised rules.

## **8.2 Segmentation and Priority Markets**

Initial demand generation concentrates on EU consumers who value safety verification, clear returns, and authentic reviews, and on SMEs seeking EU-wide access with predictable rules. The platform will target Market Areas where cross-border demand is impeded by legacy geo-blocking or inconsistent disclosures; the commercial strategy removes unjustified discrimination based on residence while preserving legitimate delivery-scope limitations and clear responsibility allocation between the marketplace and third-party traders. This alignment allows price differentiation by territory or channel while preventing access denial or forced re-routing without consent, and it clarifies who is contractually responsible for performance, withdrawal rights, and guarantees under the Consumer Rights framework.

## **8.3 Supply- and Demand-Side Seeding**

Supply is onboarded in cohorts by category and locality to ensure selection depth where we run demand campaigns. Early cohorts emphasise: (i) goods requiring GPSR-aligned safety attestations and traceability, (ii) services that benefit from marketplace identity and information duties, and (iii) circular and refurbished categories where transparent price-reduction histories build trust. Demand is seeded through owned channels, ethical influencer partnerships, and local activations in the WOSL Group footprint, with strict conformance to advertising-label rules and discouragement of design patterns that could impair free and informed choice. The platform's curation and ranking disclosures to business users are synchronised with consumer-facing recommender explanations, limiting disputes and enabling merchants to optimise listings without manipulation.

## **8.4 Channel Strategy and Communications Compliance**

Outbound email/SMS and in-product messaging use consent and transparency standards that align the ePrivacy Directive with GDPR legal bases; opt-in capture, double-opt-in where feasible, intelligible purpose statements, and one-click unsubscribe are enforced as process controls and logged for audit.

Influencer activity is procured under contracts that require conspicuous advertising disclosures and compliance with CPC-network expectations; campaign selection favours creators with demonstrated adherence to labelling norms and brand-safety policies. These controls reduce the probability of enforcement actions arising from opaque endorsements or unsolicited communications and protect channel reputation metrics critical to deliverability and reach.

#### **8.5 Pricing, Promotions, and Incentives—Commercial Policy**

All price-reduction announcements reference the “prior price” defined as the lowest price applied during a period of not less than 30 days before the reduction, with category-specific deviations only where Member State options apply (e.g., rapidly perishable goods or progressive reductions). Merchants are trained, and the UI is engineered, to present unit prices and reduced prices in a manner that is unambiguous, easily identifiable, and clearly legible, avoiding artificial reference pricing. Platform-funded vouchers and dynamic personalised prices—as permitted—are disclosed as such; any personalised pricing uses language and placement consistent with CRD/UCPD guidance to avoid misleading effects. These measures are folded into listing and promotion workflows so that marketing velocity does not compromise legality.

#### **8.6 Reviews, Endorsements, and Recommender Transparency**

S’agapo’s review system sets clear statements about whether and how review authenticity is verified, reflecting Commission guidance that treats fabricated or manipulated reviews as unfair commercial practices. Recommender systems disclose the main parameters, their relative importance, and consumer options to modify them; paid prominence, if any, is flagged to business users under the P2B Regulation and to consumers under the DSA advertising and recommender transparency provisions. This dual transparency reduces asymmetries for merchants and users and is implemented through parameter inventories, versioned change logs, and synchronised terms and notices.

#### **8.7 Cross-Border Access, Targeting, and Delivery**

The go-to-market stance is “open by default” across the EU/EEA online interface, without unjustified geo-blocking or payment-instrument discrimination, while allowing merchants to define delivery geographies and collection options transparently. Where the marketplace itself is not the contractual seller, consumer interfaces clarify the identity and status of the trader and whether consumer-law rights are enforceable against the trader or the platform, consistent with the amended Consumer Rights Directive obligations for online marketplaces. This design supports lawful segmentation by logistics feasibility and tax posture without engaging in prohibited forms of market partitioning.

#### **8.8 Merchant Enablement and Ranking-Disclosure Operations**

Before launch in each Market Area, S’agapo provides a merchant enablement kit: ranking-parameter summaries, examples of how remuneration and service-quality metrics affect ranking, and notice of planned changes with appropriate lead times. The P2B ranking-transparency guidelines are operationalised through standard descriptors and interface locations that business users can easily access; consumer-facing notices are drafted in plain language and surfaced where ranking and recommendations are presented. Internally, a governance routine ensures consistency across commercial, product, and legal teams so that disclosures are accurate, comprehensible, and updated in step with algorithmic or policy changes.

#### **8.9 Advertising Labelling, Dark-Pattern Avoidance, and UX Policy**

All ads are labelled as advertising with the identity of the advertiser and meaningful information about the main targeting parameters, to the extent applicable to a non-VLOP online platform; opt-outs or controls are made directly accessible from the relevant UI surfaces. The platform refrains from interface

designs that deceive or manipulate users or otherwise materially impair free and informed decision-making, including undue prominence of specific choices, repetitive prompts to revisit decisions, or asymmetric friction in cancellations or terminations. Product and design teams are trained on these standards and supplied with examples of prohibited patterns, and legal routinely reviews experiments before rollout.

#### **8.10 KPIs, Targets, and Feedback Loops**

Growth is managed on a cohort basis with an emphasis on quality of GMV and compliance integrity. Core metrics include: verified-review ratio; promotion error-rate (prior-price violations per 1,000 promotions); ad-labelling coverage; recommender-disclosure view rate; cross-border conversion where delivery is feasible; and complaint-to-order ratio. These are tied to remediation SLAs and periodic transparency reporting obligations where applicable. Process audits test whether ranking disclosures to merchants match live parameter weights and whether consumer explanations reflect the active configuration; variances trigger corrective disclosures and, where needed, offer neutral default settings pending remediation.

#### **8.11 Execution Roadmap**

Phase 1 (T0–T+90): launch in two Market Areas with seed categories, merchant enablement, and baseline disclosures for ranking, advertising, and recommenders. Phase 2 (T+90–T+180): expand categories, activate cross-border access with clear delivery options, and deploy campaign toolkits that automate price-reduction compliance. Phase 3 (T+180 onward): scale influencer and affiliate channels subject to labelling audits; extend transparency reporting and prepare for any elevated DSA duties as user numbers grow. This cadence ensures that acceleration in acquisition is matched by the steady operation of transparency controls and consumer-law safeguards.

#### **8.12 Risk Controls Embedded in Go-to-Market**

Primary legal risks in acquisition and merchandising are: misleading price reductions; opaque endorsements; inadequate marketplace role disclosures; and manipulative interface choices. Mitigations are embedded directly in GTM tooling and design standards: PID/Omnibus guardrails on discounts; CPC-compliant influencer contracts and monitoring; CRD-aligned marketplace disclosures at point of sale; DSA advertising and recommender notices; and a standing prohibition on dark patterns. These mitigations are proportionate to the platform’s scale and evolve as thresholds change under the DSA.

## **9. Risk Management**

The risk management framework is designed to protect the marketplace’s licence to operate, sustain consumer and merchant trust, and preserve cross-border scalability. Governance follows a clear line of accountability from the Board through executive management to control owners, with independent internal audit providing assurance over design and operating effectiveness. The framework combines legal-regulatory controls, operational resilience, data protection, financial safeguards, and reputational risk discipline, and is embedded in product design and day-to-day execution.

#### **9.1 Governance, Appetite, and Control Architecture**

Risk appetite is documented at Board level and expressed in measurable limits for consumer harm, product safety incidents, unlawful content exposure, payment fraud losses, privacy breaches, and regulatory findings. A central risk register maps inherent risks to controls, owners, KRIs, testing routines, and escalation paths. Product and engineering changes are gated by legal sign-off where they may affect consumer disclosures, ranking, recommendations, advertising labelling, pricing displays,



personal-data processing, or safety-critical workflows. Independent internal audit tests control design and timeliness, and issues tracking requires closure evidence before items are downgraded.

## 9.2 Legal and Regulatory Risks

The marketplace is subject to the Digital Services Act's platform duties, including recommender transparency, advertising transparency, interface design requirements, transparency reporting, and cooperation with authorities; enforcement has intensified for platforms that meet scale thresholds, with formal investigations and requests for information already public in 2023–2024.

The interface must not be designed or operated in ways that deceive or manipulate recipients or materially impair their ability to make free and informed decisions, and this prohibition specifically cautions against undue prominence of certain choices, repeated pop-ups to reverse a choice, or creating more friction to terminate than to subscribe.

Recommender systems must disclose the main parameters, their relative importance, and the options for users to modify them, with direct access to such controls where the information is prioritised.

For product safety, the General Product Safety Regulation (EU) 2023/988 modernises duties for non-food consumer products, reinforces recalls, and formalises the Safety Gate ecosystem (Rapid Alert System, public portal, and business interfaces) through which authorities, the Commission, and the public exchange information on dangerous products and complaints.

Online marketplaces have defined due-diligence and cooperation duties under the GPSR, including designated safety contact points and responsiveness to Safety Gate alerts and orders.

EU consumer law imposes specific transparency on price reductions and price indications: any announcement of a reduction must display the prior price as the lowest price applied during a period of not less than 30 days before the reduction, and price/ unit-price displays must be unambiguous, easily identifiable, and clearly legible.

Updated UCPD guidance treats fabricated, manipulated, or unverifiable consumer reviews as unfair commercial practices and requires clear messaging on whether and how review authenticity is verified.

For online marketplaces, the Consumer Rights Directive as amended by Directive (EU) 2019/2161 requires clear identification of the third-party trader, the marketplace's role, and the allocation of contractual responsibility for performance and statutory rights.

The Geo-blocking Regulation prohibits unjustified blocking, access limitation, or automatic re-routing based on nationality, residence, or establishment, while allowing traders to limit delivery geographies and to differentiate prices lawfully across channels and territories.

The Platform-to-Business Regulation and its Commission Guidelines require accessible descriptions of the main ranking parameters and how remuneration influences presentation; providers must notify business users of relevant changes with adequate lead time.

Marketing communications must respect the ePrivacy Directive's rules on consent for electronic communications and complement GDPR's lawfulness and transparency requirements; email/SMS campaigns require valid consent, intelligible purpose statements, and straightforward withdrawal mechanisms.

Influencer marketing is under active CPC-network scrutiny; influencers acting as traders must disclose advertising in a transparent manner, with the Commission and national authorities conducting sweeps and launching an Influencer Legal Hub to clarify obligations.

The CPC Regulation equips national authorities with powers to order take-downs, conduct mystery shopping, and coordinate cross-border enforcement actions with penalties that may reach at least 4% of turnover following the Omnibus amendments.

### **9.3 Taxation and Payments Regulation**

Under the 2021 VAT e-commerce package, the OSS/IOSS schemes simplify cross-border VAT reporting, and marketplaces can be deemed suppliers in defined scenarios—particularly for certain imports and domestic supplies facilitated via the platform—necessitating correct VAT determination, collection, and reporting.

Payment operations must comply with PSD2's SCA/RTS regime and evolving supervisory interpretation (including EBA Q&As on wallets and mandatory exemptions for certain account-information access), with the planned PSD3/PSR reforms to authorisation and anti-fraud frameworks to be tracked and implemented accordingly.

Surcharging on most consumer card payments regulated under the Interchange Fee Regulation is prohibited by PSD2 Article 62(4) as transposed, with IFR interchange caps at 0.2% for consumer debit and 0.3% for consumer credit shaping cost and pricing assumptions.

### **9.4 Data Protection and Privacy**

Data protection by design and by default is implemented pursuant to GDPR Article 25, limiting collection, processing scope, retention, and access to what is necessary for specified purposes, and integrating safeguards such as pseudonymisation and role-based access.

High-risk processing such as fraud-screening models, review-authenticity checks, and recommender personalisation is subject to DPIAs, with records of processing and lawful-basis assessments maintained for verifiability.

### **9.5 Operational Risks and Resilience**

Operational risks centre on KYBC onboarding accuracy, moderation timeliness, product-safety escalations, fulfilment and returns execution, and settlement reconciliations. Controls include documented SOPs for notice-and-action triage, trusted-flagger prioritisation, statement-of-reasons generation, and transparency reporting under the DSA.

Product safety incidents trigger Safety Gate-aligned recall flows and authority cooperation, with communication templates and evidence repositories pre-approved.

Business-continuity and disaster-recovery plans cover core platform services, payments, identity and auth, and data pipelines; recovery objectives are set to protect settlement cycles and consumer redress timelines.

### **9.6 Financial and Counterparty Risks**

Chargebacks, refunds, and fraud losses are capped by tolerance thresholds; reserves and rolling holds are configured with PSPs for loss absorption while balancing merchant liquidity. PSP concentration risk is reduced through multi-acquirer routing and tested fallbacks; regulatory, operational, or credit deterioration at partners triggers defined contingencies. VAT exposure is mitigated by OSS/IOSS

reconciliations, controls around deemed-supplier scenarios, and routine variance analysis against PSP and warehouse data.

### **9.7 Model and Algorithmic Risks**

Ranking and recommender systems are governed by a model-risk standard that requires parameter inventories, change control, A/B guardrails, bias and manipulation tests, and synchronised disclosures to business users (per P2B guidelines) and consumers (per DSA Article 27).

Updates that materially shift exposure or incentives are pre-briefed to affected merchants with notice periods aligned to guideline expectations.

### **9.8 Conduct and Interface Risks**

The user-experience policy prohibits dark patterns and mandates symmetry between subscription and termination flows, plain-language choices, and minimal prompt repetition, in line with the DSA's interface-design provision.

Pricing and promotional UI components enforce prior-price logic and legibility standards to avoid UCPD/PID/Omnibus breaches.

Review components disclose verification methods and avoid unverifiable claims.

### **9.9 Key Risk Indicators, Monitoring, and Reporting**

KRIs include: notice-to-decision cycle time; percentage of Safety Gate-related takedowns executed within mandated windows; prior-price compliance rate across promotions; ad-labelling coverage rate; recommender-explanation view rate; proportion of reviews with verified provenance; SCA challenge/approval mix and fraud-to-sales ratio; cross-border access denials; and share of marketplace transactions with clear role disclosures. DSA-related transparency reporting, where applicable, is produced on statutory cadence and archived for inspection.

CPC-network engagements and sweep results are tracked to ensure corrective actions and to pre-empt recurring findings.

### **9.10 Assurance, Testing, and Incident Response**

Second-line compliance conducts thematic reviews on price reductions, influencer disclosures, geo-blocking, VAT postings, and data-protection controls; findings are escalated to the Audit and Risk Committee with remediation timelines.

Incidents trigger a unified response playbook that coordinates legal notices (e.g., DSA statement-of-reasons, GPSR safety communications), consumer redress, PSP notifications, and authority cooperation; post-incident reviews generate control hardening and, where necessary, updated disclosures to users and business partners.

## **10. SWOT Analysis**

### **Strengths**

S'agapo's primary strength lies in its compliance-by-design architecture, which integrates obligations under the Digital Services Act (DSA), General Product Safety Regulation (GPSR), GDPR, and consumer-protection directives into core processes. This legal robustness differentiates the platform from competitors that treat compliance as an afterthought, reducing enforcement risk and enhancing trust among consumers and merchants. The marketplace also benefits from its affiliation with the WOSL Group, providing a ready network for merchant acquisition and brand credibility. Its modular



operating model, harmonized across Market Areas, supports scalability without sacrificing governance consistency.

### Weaknesses

The compliance-centric approach, while a differentiator, introduces higher initial operating costs and longer time-to-market compared to less regulated competitors. The platform's reliance on EU-specific frameworks may limit agility in non-EU expansions unless localization strategies are developed early. Additionally, the need for rigorous KYBC onboarding and product-safety attestations could deter micro-merchants or informal sellers, slowing early supply-side growth.

### Opportunities

The tightening of EU platform regulation creates a structural advantage for marketplaces that operationalize compliance effectively. S'agapo can leverage this to position itself as a "safe and lawful" marketplace, appealing to consumers fatigued by counterfeit and unsafe goods. The rise of circular economy and refurbished goods markets aligns with S'agapo's transparency and traceability ethos, offering category-expansion potential. Strategic partnerships with logistics providers and PSPs can further enhance cross-border trade efficiency, while integration with WOSL's social-impact narrative strengthens brand differentiation.

### Threats

Regulatory risk remains dynamic: thresholds under the DSA, PSD3 reforms, and evolving CPC enforcement could impose additional obligations or penalties for non-compliance. Competitive threats include global incumbents with deep capital reserves and the ability to absorb compliance costs while maintaining aggressive pricing. Cybersecurity and data-protection breaches pose reputational and financial risks, particularly given GDPR's penalty regime. Finally, macroeconomic volatility and consumer-spending contractions could dampen marketplace transaction volumes, delaying breakeven.

### SWOT Analysis

Factor	Description
<b>Strengths</b>	<ul style="list-style-type: none"> <li>Compliance-by-design (DSA, GPSR, GDPR, Omnibus) reduces enforcement risk.</li> <li>Affiliation with WOSL Group for network leverage.</li> <li>Modular, scalable operating model with harmonized governance.</li> </ul>
<b>Weaknesses</b>	<ul style="list-style-type: none"> <li>Higher initial costs and slower launch due to compliance rigor.</li> <li>EU-centric design limits agility for non-EU markets.</li> <li>KYBC and safety attestations may deter small sellers.</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Regulatory tightening favors compliant platforms.</li> <li>Growth in circular/refurbished goods markets.</li> <li>Cross-border trade facilitation via OSS/IOSS and logistics partnerships.</li> <li>Brand differentiation through social-impact positioning.</li> </ul>

Factor	Description
Threats	<ul style="list-style-type: none"><li>• Evolving regulatory landscape (DSA thresholds, PSD3, CPC enforcement).</li><li>• Competition from global incumbents with scale advantages.</li><li>• Cybersecurity and GDPR breach risks.</li><li>• Macroeconomic downturn impacting consumer spend.</li></ul>

## 11. PESTEL Analysis

### Political

The European Union's Digital Single Market strategy and harmonized consumer-protection directives create a favorable political environment for cross-border e-commerce. However, political fragmentation within Member States—manifested in divergent enforcement priorities and national options under directives—introduces complexity. Trade relations with non-EU jurisdictions and geopolitical tensions affecting supply chains may also influence category availability and logistics costs.

### Economic

Macroeconomic volatility, inflationary pressures, and fluctuating consumer confidence directly affect discretionary spending and marketplace GMV. Conversely, the structural growth of e-commerce and the EU's emphasis on digitalization and SME enablement provide a supportive backdrop. The VAT e-commerce package and OSS/IOSS schemes reduce compliance friction for cross-border trade, but currency fluctuations and payment-processing costs remain material considerations.

### Social

Consumer expectations increasingly prioritize safety, authenticity, and sustainability. The rise of the circular economy and demand for refurbished goods align with S'agapo's compliance and transparency ethos. However, social fatigue with opaque algorithms and manipulative design patterns heightens scrutiny of recommender systems and advertising practices, requiring proactive transparency measures to maintain trust.

### Technological

Advances in AI-driven personalization, fraud detection, and automated moderation offer efficiency gains but introduce algorithmic-bias and explainability risks. Cybersecurity threats remain pervasive, with ransomware and credential-stuffing attacks posing systemic risks to platform integrity. Interoperability with PSPs, logistics APIs, and identity-verification services is critical for scalability, while adherence to GDPR principles constrains data-driven innovation.

### Environmental

Regulatory and consumer pressure for sustainable commerce is intensifying, with expectations for reduced packaging waste, carbon-neutral delivery options, and transparent environmental claims. Failure to align with these expectations could erode brand equity. Conversely, promoting refurbished and circular-economy categories offers both compliance and reputational advantages.

### Legal

The legal environment is characterized by continuous evolution: the Digital Services Act imposes obligations on notice-and-action, recommender transparency, and advertising labelling; the General Product Safety Regulation strengthens marketplace duties for dangerous products; GDPR and the ePrivacy Directive govern data processing and marketing communications; and the Omnibus Directive

updates consumer-law enforcement with penalties up to 4% of turnover. Anticipated reforms under PSD3/PSR and AI-governance frameworks will further shape operational requirements.

#### PESTEL Analysis – Table

Factor	Key Considerations
<b>Political</b>	<ul style="list-style-type: none"> <li>• EU Digital Single Market supports cross-border trade.</li> <li>• Divergent national enforcement priorities.</li> <li>• Geopolitical tensions affecting supply chains.</li> </ul>
<b>Economic</b>	<ul style="list-style-type: none"> <li>• Inflation and consumer-spending volatility.</li> <li>• Growth in e-commerce and SME enablement.</li> <li>• OSS/IOSS reduces VAT complexity; currency and PSP costs persist.</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>• Demand for safety, authenticity, and sustainability.</li> <li>• Growth of circular economy and refurbished goods.</li> <li>• Heightened scrutiny of algorithms and advertising.</li> </ul>
<b>Technological</b>	<ul style="list-style-type: none"> <li>• AI for personalization and fraud detection; bias and explainability risks.</li> <li>• Cybersecurity threats (ransomware, credential attacks).</li> <li>• Need for API interoperability under GDPR constraints.</li> </ul>
<b>Environmental</b>	<ul style="list-style-type: none"> <li>• Pressure for sustainable packaging and carbon-neutral delivery.</li> <li>• Opportunity in refurbished and circular-economy categories.</li> <li>• Risk of greenwashing claims if disclosures lack rigor.</li> </ul>
<b>Legal</b>	<ul style="list-style-type: none"> <li>• DSA, GPSR, GDPR, Omnibus impose strict obligations.</li> <li>• CPC enforcement powers and 4% turnover penalties.</li> <li>• Upcoming PSD3/PSR and AI-governance frameworks.</li> </ul>

## 12. Implementation Roadmap

The implementation roadmap is structured into phased milestones to ensure controlled deployment, regulatory alignment, and operational readiness. Each phase is sequenced to mitigate risk, enable iterative learning, and maintain compliance integrity.

#### Phase 1 – Foundation (T0–T+90 days)

- Incorporate S’agapo Markets AB and finalize governance instruments.
- Complete core platform build: merchant onboarding (KYBC), listing moderation, payment stack (PSD2 SCA), VAT OSS/IOSS integration, and GDPR-compliant data architecture.
- Deploy compliance manuals and SOPs for notice-and-action, price-reduction logic, and recommender transparency.



- Launch in two pilot Market Areas with limited categories (safety-critical goods and services).
- Establish Safety Gate contact point and authority cooperation protocols under GPSR.

#### **Phase 2 – Expansion (T+90–T+180 days)**

- Extend category coverage to include refurbished and circular-economy goods.
- Activate cross-border access with geo-blocking compliance and transparent delivery options.
- Roll out merchant enablement kits and ranking-parameter disclosures per P2B Regulation.
- Initiate influencer and affiliate campaigns under CPC-compliant contracts.
- Implement internal audit routines for KYBC completeness, VAT postings, and GDPR controls.

#### **Phase 3 – Scale and Optimization (T+180–T+360 days)**

- Expand to additional Market Areas within the EU/EEA.
- Deploy advanced fraud-detection models and recommender personalization with DPIAs.
- Introduce sustainability features (carbon-neutral delivery options, environmental claim disclosures).
- Prepare for potential DSA threshold obligations (e.g., transparency reporting, risk assessments).
- Conduct external penetration testing and compliance audits to validate resilience.

## **13. Monitoring, Evaluation, and Learning (MEL)**

The MEL framework ensures that implementation progress, compliance integrity, and strategic objectives are continuously assessed and improved. It operates on three pillars: **Monitoring**, **Evaluation**, and **Learning**.

### **Monitoring**

- **Operational KPIs:** GMV growth, merchant onboarding cycle time, notice-and-action resolution within statutory windows, Safety Gate response compliance, and VAT reconciliation accuracy.
- **Compliance KPIs:** Prior-price compliance rate, ad-labelling coverage, recommender-disclosure view rate, verified-review ratio, and GDPR rights-request turnaround.
- **Risk Indicators:** Fraud-to-sales ratio, chargeback rate, and data-breach incident frequency.

### **Evaluation**

- Quarterly internal audits on legal obligations (DSA, GPSR, Omnibus, GDPR) and financial controls.
- Semi-annual external compliance reviews and penetration tests.
- Merchant and consumer satisfaction surveys to assess trust and usability.
- Benchmarking against EU enforcement trends and competitor practices.



## Learning

- Post-incident reviews feeding into control hardening and SOP updates.
- Continuous training for staff on regulatory updates and UX compliance (dark-pattern avoidance, advertising transparency).
- Knowledge-sharing sessions across Market Areas to replicate best practices and address systemic gaps.
- Integration of MEL findings into product roadmaps and governance reporting to the Board.

## 14. Holistic Relevance and Ecosystem Contribution

S'agapo Markets is not an isolated commercial entity; it is an integral component of the WOSL Group's mission to operationalize social responsibility through tangible, market-based mechanisms. Its relevance is anchored in three dimensions: trust and transparency, community empowerment, and systemic integration.

### Advancing the WOSL Holistic Approach

The WOSL Group's philosophy is that social responsibility must permeate every layer of economic interaction. S'agapo embodies this by embedding compliance, ethical trade, and consumer protection into its marketplace architecture. By enforcing DSA-aligned transparency, GPSR-based product safety, and GDPR-compliant data governance, S'agapo transforms regulatory obligations into trust-building features. This approach reinforces WOSL's commitment to fairness, accountability, and sustainability, ensuring that commerce serves as a vector for social equity rather than a source of systemic risk.

### Interfaces with the Creativa Universe

S'agapo operates as a transactional and engagement node within the broader Creativa Universe. It interfaces upstream with **EUSL Federation** for SME onboarding and certification, and downstream with **Cupio Company** for citizen engagement and loyalty mechanisms. It also integrates with **Wings of Paloma** to channel volunteer recognition into marketplace incentives, and with **World Future Label (WOFL)** for educational content on ethical consumption. These linkages create a closed-loop ecosystem where economic activity, social impact, and educational advancement reinforce one another.

### Contribution Indicators

S'agapo's ecosystem contribution is evidenced through:

- **Certified Trade Penetration:** Percentage of marketplace GMV attributable to WOSL-certified businesses.
- **Social Impact Metrics:** Volume of transactions linked to circular-economy categories and verified fair-trade goods.
- **Community Engagement:** Number of loyalty points redeemed through Cupio and volunteer credits converted into marketplace benefits.
- **Compliance Integrity:** Zero-tolerance breach record for DSA, GPSR, and consumer-law obligations, supporting WOSL's reputation as a compliance leader.

## 15. Geographic Structure and Market Area Strategy

### Purpose and Scope

S'agapo adopts the WOSL Group's multi-tiered geographic framework to ensure global consistency while delivering local relevance. This structure enables the marketplace to embed ethical commerce into communities worldwide, transforming social responsibility from an aspirational concept into a measurable reality.

### Continental Framework

Operations are organized into four continental hubs:

- **Europe (EU)**
- **Africa**
- **Asia**
- **Pan-Americas (North, Central, and South America)**

Each hub provides strategic oversight, regional adaptation of marketplace standards, and stakeholder engagement. Governance at this level ensures alignment with global policies while accommodating local legal and cultural contexts.

### National Layer

Within each continent, national entities or chapters manage merchant onboarding, compliance, and consumer engagement. These entities act as the primary interface with regulators, industry associations, and civil society, ensuring that S'agapo's obligations under DSA, GPSR, and consumer law are localized without diluting global standards.

### Regional Layer

Countries are subdivided into administrative regions (e.g., "Län" in Sweden or equivalent jurisdictions elsewhere). This layer facilitates proximity to merchants and consumers, enabling responsive service delivery and context-specific engagement.

### Market Areas

The Market Area is the smallest operational unit and the primary locus of consumer interaction. Each Market Area hosts at least one instance of every core WOSL concept—certified businesses, volunteering hubs, ethical marketplaces, and training programs—ensuring comprehensive local coverage. Market Areas are dynamic: metropolitan zones may require multiple Market Areas, while sparsely populated regions may consolidate into a single unit.

### Strategic Objectives

- **Coverage:** Achieve full penetration across all Market Areas within defined timelines, prioritizing high-impact regions.
- **Consistency:** Maintain uniform standards and brand integrity across all layers while allowing for cultural and legal adaptation.
- **Integration:** Ensure Market Areas function as interconnected nodes, sharing data, resources, and best practices.



- **Scalability:** Deploy modular governance and technology systems that support rapid replication and subdivision without structural disruption.

#### **Governance and Accountability**

Each layer operates under a delegated authority model with clear accountability lines to the global WOSL governance framework. Performance metrics cascade from global KPIs to Market Area indicators, ensuring alignment and traceability.

#### **Operational Implications**

- **Resource Allocation:** Staffing, training, and infrastructure investments are calibrated to Market Area density and growth forecasts.
- **Technology Enablement:** Digital platforms provide real-time visibility of Market Area performance, member engagement, and compliance status.
- **Community Engagement:** Local advisory councils and stakeholder forums institutionalize feedback loops, reinforcing legitimacy and trust.

#### **Contribution to WOSL Group Mission**

S'agapo advances WOSL's mission by operationalizing trust, certification, and transparency in commerce, while fostering public engagement through ethical consumption and loyalty programs.

#### **Synergies with Sister Sub-Organizations**

- **Cupio Company:** Loyalty and citizen engagement mechanisms integrated into marketplace incentives.
- **Wings of Paloma:** Volunteer recognition linked to marketplace benefits.
- **World Future Label (WOFL):** Educational content on ethical trade embedded in user experience.

#### **Upstream and Downstream Dependencies**

- **Inputs:** Certified merchant pipelines from EUSL Federation; compliance frameworks from WOSL governance.
- **Outputs:** Transactional data for impact reporting; consumer engagement metrics for Cupio and WFB platforms.

#### **Ecosystem Contribution Indicators**

- Market Area coverage ratio.
- Cross-border transaction share under OSS/IOSS compliance.
- Engagement index combining loyalty redemption, volunteer credits, and educational content consumption.

## **16. Financial Model and Unit Economics**

#### **Nature of the Entity**

S'agapo Markets is a **purpose-driven for-profit entity** operating under WOSL Group governance. It combines commercial sustainability with impact covenants that align with the Charity as a Business model and Agenda 2074 objectives.



### Revenue Architecture

The revenue model is transaction-based, supplemented by premium merchant services and advertising that complies with DSA transparency obligations. Core streams include:

- **Marketplace Commission:** Percentage fee on GMV, differentiated by category and compliance tier.
- **Subscription Plans:** Merchant packages offering enhanced visibility, analytics, and compliance support.
- **Advertising Services:** Sponsored listings and campaigns, clearly labelled per DSA Article 26.
- **Value-Added Services:** Logistics integration, payment facilitation, and sustainability badges.

### Unit Economics

- **Average Order Value (AOV):** €65 (baseline assumption for mixed goods/services).
- **Take Rate:** 10% blended commission, yielding €6.50 per transaction.
- **Payment Processing Cost:** 1.2% of GMV plus €0.20 per transaction.
- **Fraud and Chargeback Reserve:** 0.3% of GMV.
- **Customer Acquisition Cost (CAC):** €18 initial, declining to €12 at scale.
- **Lifetime Value (LTV):** €120 per active consumer (based on 8 transactions/year, 18-month retention).

### Coverage Ratios

Break-even is projected at **€3.5 million GMV/month**, assuming fixed operating costs of €350,000 and contribution margin of 10%. Sensitivity analysis accounts for regulatory cost shocks (e.g., DSA compliance reporting) and PSP fee volatility.

### Financial Discipline

Quarterly variance analysis and rolling forecasts are mandatory. Capital allocation prioritizes compliance infrastructure, cybersecurity, and merchant enablement before discretionary marketing spend. Dividend policy is subordinated to reinvestment until positive free cash flow is sustained for four consecutive quarters.

## 17. Appendices

### A. Glossary

- **DSA:** Digital Services Act (Regulation (EU) 2022/2065).
- **GPSR:** General Product Safety Regulation (EU) 2023/988.
- **P2B:** Platform-to-Business Regulation (EU) 2019/1150.
- **OSS/IOSS:** One-Stop Shop / Import One-Stop Shop VAT schemes.

### B. Assumptions and Calculation Notes

- GMV growth modeled at 12% MoM during first 12 months post-launch.
- CAC reduction curve assumes 40% organic acquisition by month 18.



### C. KPI Dictionary

- **GMV:** Gross Merchandise Value.
- **Notice-and-Action SLA:** Average time to process illegal content notifications.
- **Verified Review Ratio:** Share of reviews authenticated via transaction linkage.

### D. Policy Register

- DSA Transparency Policy.
- GDPR Data Protection Impact Assessment Register.
- Price Reduction Compliance SOP (Omnibus Directive).

### E. Evidence Base and References

- European Commission Guidance on UCPD and Omnibus (2022).
- EBA Opinion on PSD2 SCA Implementation (2023).
- Commission Notice on Geo-Blocking Regulation (2021).

### F. Risk Register (Detailed)

- **Regulatory Risk:** DSA non-compliance → Mitigation: Legal sign-off gates, quarterly audits.
- **Cybersecurity Risk:** Data breach → Mitigation: ISO 27001 controls, penetration testing.
- **Financial Risk:** PSP insolvency → Mitigation: Multi-acquirer routing, reserve buffers.

## 18. Final Word

S'agapo Markets is conceived not as a conventional marketplace but as a structural instrument for social equity, embedded within the WOSL Group's integrated architecture and aligned with the Agenda for Social Equity 2074. By operationalizing compliance, transparency, and ethical trade as growth levers, S'agapo demonstrates that commercial viability and social responsibility are not competing objectives but mutually reinforcing imperatives. Its success will be measured not only in GMV or profitability but in its contribution to systemic trust, consumer protection, and the democratization of market access for SMEs across geographies.

The roadmap ahead is ambitious yet disciplined: phased expansion, rigorous monitoring, and continuous learning will ensure resilience in a volatile regulatory and economic landscape. As part of the Creativa Universe, S'agapo is more than a platform—it is a node in a global ecosystem designed to transform commerce into a force for inclusive prosperity.

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