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WORLD SOCIAL LABEL TRADE BUSINESS PLAN

*FOR AN OPEN, GLOBAL MARKET FOR THE SMALL AND MEDIUM
ENTERPRISES*

Created by

EUSL AB

Care to Change the World

Table of Contents

1. Executive Summary.....	2
2. Organisation Overview	3
3. Mission and Strategic Alignment	3
4. Market and Stakeholder Analysis.....	4
5. Products, Services, and Value Proposition.....	4
6. Operating Model and Capabilities.....	5
7. Financial Model and Sustainability	6
8. Risk Management	7
9. SWOT Analysis	7
10. PESTEL Analysis	9
11. Implementation Roadmap.....	12
12. Monitoring, Evaluation, and Learning (MEL)	13
13. Holistic Relevance and Ecosystem Contribution	14
14. Geographic Structure and Market Area Strategy	17
15. Compliance, Ethics, and Safeguarding	18
16. Appendices.....	20
17. Final Word	21
References.....	21

WOSL Trade - Business Plan

1. Executive Summary

WOSL Trade is a specialized sub-organization within the WOSL Group, established to facilitate seamless cross-border trade between members of the European Social Label (EUSL) and its global counterparts. Its primary function is to eliminate traditional barriers to commerce by operating within the legal framework of a membership association, thereby enabling transactions that mirror the original intent of economic unions: the free movement of goods, services, and funds.

Nature of the entity: Purposedriven for-profit with a compliance mandate.

Mission: To create a frictionless, trust-based trade environment for WOSL Group members, ensuring equitable access to markets and financial solutions.

Vision: A globally integrated trade ecosystem where members transact without borders, supported by transparent governance and innovative financial instruments.

Strategic role within WOSL Group: WOSL Trade serves as the operational bridge between national EUSL entities, ensuring that member-to-member transactions occur within a controlled, compliant, and value-adding framework. It underpins the Group's ambition to replicate the benefits of economic integration on a global scale.

Primary objectives (next 12–24 months):

- Establish and operationalize the intra-network trade model across all EU-based EUSL entities.
- Develop governance protocols for multi-party transactions involving national EUSL intermediaries.
- Prepare the legal and operational groundwork for Growthify Markets, the future factoring and financial services platform.
- Build strategic partnerships with financial institutions to support phased introduction of equal payment solutions.

Funding and sustainability summary: Initial operations will be funded through WOSL Group allocations and transaction-based service fees. Long-term sustainability will derive from factoring services, membership-driven trade volumes, and financial product integration under Growthify Markets.

Key risks and mitigations: Regulatory uncertainty in cross-border trade and financial services will be mitigated through legal structuring within association frameworks and phased compliance reviews. Operational risk will be addressed via standardized transaction protocols and digital monitoring systems.

Decision ask: Approval to proceed with the phased rollout of WOSL Trade operations and initiate preparatory work for Growthify Markets integration.

2. Organisation Overview

Legal structure and registration: WOSL Trade will be incorporated as an Aktiebolag (AB) under Swedish jurisdiction, with potential registration of branch entities in other EU member states as required for compliance.

Ownership and control: 100% owned by WOSL Group Holding, with governance oversight delegated to the WOSL Group Board. Voting rights remain centralized to ensure strategic alignment.

Governance: A lean governance model comprising a Managing Director, Compliance Officer, and Finance Lead, reporting to the WOSL Group Executive Committee. Quarterly board reviews will ensure adherence to compliance and performance standards.

Geographic scope: Initial operations will cover the European Union, with progressive expansion to Africa, Asia, and the Americas in alignment with WOSL Group's global strategy.

Regulatory compliance: WOSL Trade will operate under association-based trade frameworks, ensuring compliance with EU trade directives, anti-money laundering (AML) regulations, and data protection laws (GDPR). Future financial services under Growthify Markets will require adherence to banking and factoring regulations.

Policies: WOSL Trade adopts WOSL Group's Code of Conduct, Anti-Corruption Policy, and ESG commitments. Additional policies on cross-border compliance and financial risk management will be introduced prior to Growthify Markets launch.

3. Mission and Strategic Alignment

Mission:

To enable unrestricted, secure, and equitable trade among WOSL Group members by creating a unified, association-based framework that transcends national borders and fosters economic inclusion.

Vision:

A global trade ecosystem where members transact seamlessly across jurisdictions, supported by transparent governance, innovative financial solutions, and shared social responsibility principles.

Values:

Integrity, transparency, and mutual trust underpin all WOSL Trade operations. The entity prioritizes compliance, fairness, and innovation, ensuring that every transaction contributes to sustainable economic and social outcomes.

Alignment:

WOSL Trade advances the Charity as a Business model and Agenda for Social Equity 2074 by democratizing access to cross-border markets and reducing structural barriers that disadvantage SMEs. It interfaces with PCGG and PCPP through its role in economic empowerment and with SUDESA in future digital trade facilitation.

Impact thesis:

By institutionalizing intra-network trade, WOSL Trade enables SMEs to expand beyond domestic markets without incurring prohibitive compliance costs. This results in increased liquidity, improved competitiveness, and enhanced social equity, contributing to Agenda 2074's goals of inclusive economic growth and sustainable development.

4. Market and Stakeholder Analysis

Sector overview:

Global trade remains constrained by regulatory complexity, currency volatility, and fragmented compliance regimes. SMEs, which constitute over 90% of businesses worldwide, face disproportionate barriers to cross-border commerce. WOSL Trade addresses this gap by creating a controlled, association-based trade environment that replicates the benefits of economic integration without the political and bureaucratic overhead.

Target segments:

- **Primary:** SMEs and entrepreneurs within the WOSL/EUSL membership network seeking cross-border trade opportunities.
- **Secondary:** Financial institutions and factoring partners interested in structured, low-risk trade finance opportunities.
- **Tertiary:** Development agencies and impact investors aligned with social equity and economic inclusion objectives.

Stakeholders:

- **Internal:** WOSL Group entities, national EUSL organizations, Growthify Markets (future).
- **External:** Member companies, regulators, financial partners, technology vendors.

Competitive and comparator landscape:

Traditional trade finance institutions and regional trade blocs (e.g., EU Single Market) provide partial solutions but remain inaccessible or costly for SMEs. Digital marketplaces offer reach but lack compliance and trust frameworks. WOSL Trade differentiates itself by combining **legal compliance**, **association-based governance**, and **future integrated financial services**.

Differentiation:

- Operates within a **membership association**, reducing regulatory friction.
- Introduces a **four-party transaction model** (Seller → EUSL SWE → EUSL DEN → Buyer) to ensure compliance and trust.
- Future integration of **Growthify Markets** for factoring and equal payment solutions, creating a unique value proposition for SMEs.

5. Products, Services, and Value Proposition

Core offerings:

WOSL Trade provides a structured intra-network trade mechanism that enables members to transact across borders under a unified governance framework. The core service is the facilitation of multi-party transactions involving national EUSL entities, ensuring compliance and trust. A governed, cross-border **transaction-facilitation** service that executes the standardized four-party sequence and supplies the compliance artefacts, audit trails, and dispute resolution required by members and authorities. Payment orchestration is built on PSP-provided **instant euro transfers** with **confirmation-of-payee**, thereby reducing settlement latency and misdirection risk; data required for AML and tax/VAT documentation is captured once and reused within the association

Service model:

Transactions follow a four-party structure: **Seller → EUSL Sweden → EUSL Denmark → Buyer**. This model ensures that trade occurs within the association, reducing regulatory friction and simplifying settlement. Services include transaction validation, compliance oversight, and dispute resolution.

Value proposition:

- **For sellers:** Access to new markets without the complexity of cross-border compliance.
- **For buyers:** Assurance of quality and compliance through WOSL governance.
- **For both:** Reduced transaction risk, transparent pricing, and future access to financial solutions.

Pricing and access:

Initial pricing will be based on transaction fees proportionate to trade value, with preferential rates for high-volume members. Future models will include subscription tiers for enhanced services under Growthify Markets.

Planned extensions.

Growthify Markets introduces equal-payment instruments (invoice splits, down-payments) and **factoring** once DORA-aligned controls, AML single-rulebook procedures, and capital/liquidity arrangements are evidenced. Product design anticipates **PSD3/PSR** anti-fraud and transparency provisions so that adoption of final texts requires configuration rather than re-architecture.

Member value.

Sellers gain market reach and faster cash realization; buyers gain assurance of identity, payment integrity, and recourse; both benefit from a single, reusable compliance perimeter. For SMEs, the substitution of policy-driven features—instant payments, harmonized AML, resilience norms, and soon reusable digital identity—reduces the soft costs and uncertainty inherent in cross-border trade.

Quality assurance:

All transactions are governed by WOSL Group standards, with mandatory compliance checks and digital audit trails. Dispute resolution protocols ensure fairness and accountability.

6. Operating Model and Capabilities

Organisation design:

WOSL Trade operates as a lean entity with centralized governance and decentralized execution through national EUSL intermediaries. Core roles include Trade Operations, Compliance, and Finance.

Processes:

- **Transaction initiation:** Seller and buyer register trade intent via EUSL portals.
- **Validation:** WOSL Trade verifies compliance and membership status.
- **Execution:** Funds and goods flow through the four-party model, ensuring legal and financial integrity.

Technology and data:

Initial operations will leverage WOSL Group's digital infrastructure, with future integration of Growthify Markets for factoring and payment flexibility. Blockchain-based audit trails and secure APIs will be introduced in Phase 2.

Facilities and assets:

Primarily digital infrastructure; no significant physical assets required beyond core office functions.

People and culture:

A small, specialized team with expertise in trade compliance, financial services, and digital operations.

Training programs will ensure alignment with WOSL Group values and compliance standards.

Partnerships and vendors:

Strategic partnerships with financial institutions and technology providers will be critical for Growthify Markets implementation. Vendor relationships will focus on secure payment gateways and compliance automation tools.

7. Financial Model and Sustainability

Revenue streams:

WOSL Trade will initially generate revenue through transaction-based service fees applied to intra-network trade. As trade volumes scale, additional revenue will derive from premium services, including compliance facilitation and dispute resolution. In Phase 2, the introduction of **Growthify Markets** will enable factoring services, split payments, and other financial products, creating a diversified revenue base.

Cost structure:

The cost base will remain lean during the initial phase, dominated by personnel, digital infrastructure, and compliance oversight. Variable costs will scale with transaction volume, while fixed costs will include governance, technology maintenance, and legal services.

Unit economics:

Transaction fees will be structured to ensure positive contribution margins from the outset. Factoring services under Growthify Markets will introduce additional margin opportunities, with risk-adjusted pricing models to maintain financial stability.

Funding plan:

Seed funding will be provided by WOSL Group allocations. Subsequent phases will leverage internal cash flows and strategic partnerships with financial institutions. No external equity is anticipated in the short term; however, debt instruments may be considered for Growthify Markets capitalization.

Five-year view (narrative):

Year 1–2: Establish trade facilitation services and achieve operational breakeven through transaction fees.

Year 3–4: Launch Growthify Markets, introducing factoring and equal payment solutions, driving revenue diversification.

Year 5: Expand globally, leveraging economies of scale and integrated financial services to achieve sustainable profitability.

Controls:

Robust financial governance will be implemented, including budgeting, procurement protocols, and quarterly audits. Treasury management will ensure liquidity for operational continuity and factoring obligations.

8. Risk Management

Key risks:

- **Regulatory risk:** Changes in trade or financial regulations could impact operations.
- **Operational risk:** Errors in transaction processing or compliance checks could lead to disputes or reputational damage.
- **Financial risk:** Exposure to credit defaults in factoring services once Growthify Markets is operational.
- **Technology risk:** Cybersecurity threats and system failures could disrupt operations.

Mitigation strategies:

- Regulatory risk will be mitigated through continuous legal monitoring and engagement with compliance experts.
- Operational risk will be addressed via standardized processes, staff training, and digital audit trails.
- Financial risk will be managed through credit scoring, collateral requirements, and insurance coverage for factoring services.
- Technology risk will be mitigated by implementing multi-layered security protocols, regular penetration testing, and disaster recovery plans.

Risk governance:

A dedicated Compliance and Risk Officer will oversee risk management, reporting quarterly to the WOSL Group Board. Incident response protocols will be documented and tested annually.

9. SWOT Analysis

9.1 Table

Strengths	Weaknesses	Opportunities	Threats
Association-based, four-party trade structure that reduces friction for member SMEs and standardizes cross-border workflows	Early-stage brand visibility outside the WOSL/EUSL ecosystem; reliance on group adoption momentum	Convergence of European regulatory initiatives that enable safer, faster payments, digital identity, and uniform AML controls	Regulatory shifts, supervisory expectations, and enforcement intensification across AML/CFT, payments, and digital resilience regimes
Lean operating footprint with centralized governance and	Growthify Markets not yet operational; limited initial	Progressive digital identity and trust frameworks that	Cybersecurity, operational resilience, and data-protection failures cascading

Strengths	Weaknesses	Opportunities	Threats
delegated execution via national EUSL entities	financial product breadth	could streamline KYC and onboarding	across interlinked systems
Embedded trust and compliance culture through WOSL standards and dispute resolution	Capacity constraints as volumes scale across multiple jurisdictions	Rising demand among SMEs for compliant, documented cross-border trade and factoring solutions	Competitive responses from established trade-finance platforms and large marketplaces

9.2 Narrative

WOSL Trade’s structural advantage is the institutionalization of intra-network commerce through a four-party transaction model that formalizes trust and compliance while preserving the speed and proximity of a member association. This arrangement—Seller → EUSL Sweden → EUSL Denmark → Buyer—allows the organization to handle identity, status, and compliance checks within the network and to standardize documentation, dispute handling, and settlement routines. The model is reinforced by a lean operating footprint and a governance approach that keeps direction centralized while using national EUSL nodes for proximity to members, regulators, and tax authorities.

The principal weaknesses at this stage are those of a platform in controlled ramp-up. Brand visibility beyond the WOSL/EUSL community is nascent; initial product breadth is deliberately constrained pending the launch of Growthify Markets; and core processes must be stress-tested for scale as the framework extends from EU corridors to Africa, Asia, and the Americas. These constraints are manageable and, in several respects, deliberate—enabling governance to mature ahead of velocity.

Opportunities are unusually well-aligned with the policy and infrastructure direction of travel in the EU payments and trade environment, which is the first theatre of operation. Instant payments in euro are now mandated for payment service providers, with name/IBAN matching (“confirmation of payee”) and fraud-alert safeguards, compressing settlement cycles and enabling new service layers for merchants and platforms; this directly supports WOSL Trade’s equal-payments and split-payment roadmap under Growthify Markets.

In parallel, the Digital Operational Resilience Act (DORA) applies from 17 January 2025 to financial entities and critical ICT providers, which, while raising resilience obligations, also sets a common playbook for incident reporting, testing, and third-party oversight—conditions favorable to standing up factoring and payment capabilities in a controlled manner.

The ongoing PSD3/Payment Services Regulation process is designed to modernize the PSD2 framework, strengthen anti-fraud measures, and improve transparency; once finalized, it is likely to codify practices (e.g., data access, IBAN/name checks) that dovetail with WOSL Trade’s controls.

A uniform EU AML package—featuring a single rulebook regulation and the new AML Authority (AMLA)—reduces fragmentation across Member States and clarifies obligations for obliged entities, improving the predictability of cross-border onboarding and monitoring.

Furthermore, the EU's eIDAS 2.0 and the European Digital Identity Wallet mandate will progressively provide standardized, high-assurance identity credentials by 2026–2027, potentially compressing KYC friction and enabling reusable identity flows across borders and industries.

Threats concentrate around regulatory tightening and supervisory intensity, which may raise the operating bar faster than smaller entities can adapt if not anticipated. The NIS2 Directive elevates cybersecurity baselines across many sectors and has active infringement proceedings for late transposition, signaling enforcement focus; vendors and partners will need to evidence compliance for interconnected operations.

DORA's application and the layered EU data-protection regime (GDPR) elevate the cost of failure in resilience and privacy.

The AI Act introduces phased obligations from 2025 onward for certain AI uses (including risk management, transparency, and governance for general-purpose models), which will matter if automated decisioning, screening, or customer-service tools use AI at scale.

Environmental trade overlays also matter. The Carbon Border Adjustment Mechanism (CBAM) moves from reporting-only to financial adjustments from 2026 for covered goods, and the CSRD/CSDDD regime expands disclosure and due-diligence expectations; these increase compliance expectations on counterparties and create demand for verifiable documentation within trade workflows, but also raise the complexity and cost of doing business for SMEs if not well-tooled.

Strategically, WOSL Trade should sequence productization to follow the regulatory rails: leverage instant payments and confirmation-of-payee controls for the equal-payments proposition; design Growthify Markets to be DORA-ready, AML single-rulebook compliant, and PSD3/PSR-aligned from inception; adopt eIDAS-compatible identity orchestration to derisk onboarding; and embed CBAM/CSRD/CSDDD document capture into trade flows. This converts macro compliance vectors into defensible product features rather than overhead.

10. PESTEL Analysis

10.1 Table

Political	Economic	Social	Technological	Environmental	Legal
Integration agendas and supervisory coordination across the EU shape trade and payments policy	Interest-rate cycles and SME liquidity needs influence demand for factoring and payment flexibility	Expectations for transparent, ethical, and safe commerce shape trust requirements	Digitization of payments, digital identity, and cybersecurity standards redefine baseline capabilities	Carbon pricing at borders and sustainability reporting reshape supply-chain documentation	Harmonizing packages on AML/CFT, payments, data, AI, and operational resilience elevate

Political	Economic	Social	Technologica l	Environmenta l	Legal
					compliance baselines

10.2 Narrative

Political factors remain broadly supportive of market integration in the initial EU theatre of operation, with concrete instruments now in force to increase payment speed, safety, and interoperability across Member States. The regulation on instant credit transfers in euro obliges PSPs to offer instant payments with confirmation-of-payee safeguards and cost parity with standard transfers, thereby improving liquidity and enabling new settlement options for SMEs and platforms.

Supervisory coordination is tightening: the AML package centers on a single rulebook and the creation of AMLA, aiming to reduce national fragmentation in AML/CFT enforcement—a structural positive for cross-border operations that rely on consistent interpretations of KYC, monitoring, and beneficial ownership rules.

Economic conditions continue to emphasize SME liquidity constraints and the value of shorter cash-conversion cycles. While macro indicators fluctuate, the policy environment is actively compressing payment and settlement times (e.g., instant payments), and the legislative pipeline for payments modernization (PSD3/PSR) targets fraud reduction, transparency, and innovation enablers. For WOSL Trade, this combination underwrites the business case for equal-payment instruments and factoring once Growthify Markets is activated.

The definitive application of DORA in 2025 will add cost to regulated entities and their critical ICT providers but also reduces tail risk in financial operations, which is economically valuable when scaling mission-critical payment and factoring services.

Social dynamics reflect heightened expectations for safety, transparency, and integrity in digital transactions, particularly where SMEs and consumers rely on platforms for cross-border trade. Legislators are embedding these expectations into hard safeguards (e.g., confirmation of payee; strengthened anti-fraud coordination under PSD3/PSR), which in turn increase the premium on documented processes and auditable conduct within trade networks.

As WOSL Trade’s value proposition rests on institutionalized trust and standardized dispute resolution, these expectations align with its model and should be treated as central product features rather than ancillary obligations.

Technological factors are double-edged. On the enabling side, the EU digital identity program (eIDAS 2.0) will require Member States to offer certified wallets by 2026, paving the way for high-assurance, reusable identity credentials that can streamline onboarding, signature, and authorization flows across borders and sectors.

On the risk side, the NIS2 Directive elevates cybersecurity expectations across a wide set of sectors; the Commission has already initiated infringement procedures for late transposition, signaling that supervision will be assertive. This interacts with DORA’s resilience regime for financial entities and critical ICT providers, driving a need for robust third-party risk management, testing, and incident reporting.

The AI Act, with staged applicability through 2025–2027, will require governance, transparency, and risk management for certain AI uses; any deployment of AI in screening, onboarding, or customer operations must be mapped against these obligations and the associated standards pipeline.

Environmental policy is reshaping trade documentation and cost structures. CBAM’s transitional phase (reporting-only) runs until end-2025; from 1 January 2026, importers of covered goods will need to purchase CBAM certificates, creating a financial linkage to embedded emissions and increasing the value of verifiable emissions data within trade flows.

The CSRD expands the scope and depth of sustainability reporting, with first-wave companies reporting on FY2024 in 2025; this drives upstream data demands on SMEs and their platforms and heightens the need for integrated data capture in trade processes.

The CSDDD adds a due-diligence duty for large companies to identify, prevent, and mitigate adverse human-rights and environmental impacts across chains of activities, elevating expectations for counterparties and documentation that WOSL Trade can help structure within its workflows.

Legal factors constitute the most material set of constraints and enablers. The AML single-rulebook regulation and AMLA establishment aim to harmonize core AML/CFT requirements across the EU, reducing the variability that complicates cross-border onboarding and monitoring today.

The PSD3/PSR package, now in trilogue following the Council’s agreed position, is set to modernize PSD2, strengthen anti-fraud cooperation (including spoofing fraud measures), and improve transparency, with likely implications for data-sharing, account access, and name/IBAN checks—areas integral to WOSL Trade’s risk controls and user experience.

DORA’s application from January 2025, alongside NIS2 and existing GDPR obligations, raises the bar for ICT governance, incident reporting, vendor oversight, and data protection; these must be embedded from design in Growthify Markets and in the connective tissue between WOSL Trade and national EUSL entities.

Implications for strategy and design. The PESTEL profile suggests building WOSL Trade as a compliance-native platform. Payment flows should default to instant rails with confirmation-of-payee and fraud-intelligence sharing; identity orchestration should be eIDAS-compatible from inception; onboarding, monitoring, and factoring risk models should be parameterized to the AML single-rulebook; operational resilience should be DORA-aligned with NIS2-grade cybersecurity; and trade documentation should capture CBAM, CSRD, and CSDDD attestations where relevant, with clear role-based responsibilities between Seller, EUSL SWE, EUSL DEN, and Buyer. This positions legal/regulatory evolution as a feature that differentiates WOSL Trade for SMEs seeking predictable, border-agnostic commerce.

10.3 Institutional Linkage to GSIA (Genesis Statement)

The foregoing PESTEL profile describes both the **necessity** and the **method** for constituting the **Global Social Impact Alliance (GSIA)**. The accumulation of harmonised yet complex regulatory vectors in payments (instant euro transfers with confirmation-of-payee), operational resilience (DORA), cybersecurity (NIS2), AML/CFT (single rulebook and AMLA), digital identity (eIDAS 2.0/EU Digital Identity Wallet), and sustainability trade overlays (CBAM, CSRD, CSDDD) creates a multi-jurisdictional operating envelope that individual entities cannot efficiently navigate in isolation.

GSIA is therefore established as the supranational alliance that (i) aggregates regulatory interpretation and policy alignment across regions and RECs, (ii) provides **external validation, monitoring, and**

compliance assurance for group programs (including PCGG and future public–private missions), (iii) codifies **passportable standards** for onboarding, payments, factoring, and trade documentation, and (iv) maintains **governmental and development-finance interfaces** to enable lawful scale. In practice, **WOSL Trade** functions as the operational proof-of-concept for this architecture in the EU theatre; **GSIA** then institutionalizes the framework—extending it to Africa, Asia, and the Americas—so that member-to-member commerce can be replicated with predictable compliance, resilient infrastructure, and verifiable impact consistent with **Agenda for Social Equity 2074**. GSIA’s mandate thus converts compliance evolution into a strategic asset, ensuring that the four-party transaction model and the Growthify Markets roadmap are **portable, auditable, and investable** across jurisdictions.

11. Implementation Roadmap

Horizon 1 (0–6 months): Foundational enablement in the EU theatre

The initial period establishes the Sweden–Denmark trade corridor as the reference lane for the four-party structure (Seller → EUSL Sweden → EUSL Denmark → Buyer). Operational readiness focuses on three tracks. First, payment rails are configured to natively support euro instant payments with confirmation-of-payee, thereby enabling near-real-time settlement windows and strong payer verification. This aligns with the newly adopted instant payments regulation, including the obligation for PSPs to offer instant credit transfers and name/IBAN matching safeguards; compliance dependencies and vendor interfaces are documented accordingly.

Second, onboarding and monitoring controls are harmonised against the EU AML “single rulebook” regulation to reduce jurisdictional variance in KYC, beneficial ownership, and transaction monitoring, with policy mappings and procedural evidence retained for audit.

Third, an operational resilience baseline is instituted for critical processes and ICT providers in anticipation of DORA’s application date, including incident logging taxonomies, third-party clauses, and test plans proportionate to scale.

Acceptance criteria for Horizon 1 include: demonstrable end-to-end execution of at least ten cross-border transactions with instant payment settlement and confirmation-of-payee; onboarding and KYB/KYC files completed under the single-rulebook policy set; incident classification and reporting workflows executed in table-top tests. These criteria reflect the legal and infrastructural context and will be assessed before corridor replication.

Horizon 2 (6–18 months): Scale-out and compliance hardening

The second period extends the model to additional EU corridors while introducing the first elements of Growthify Markets on a paper-release basis, with controlled pilots for equal-payment schedules (split invoices and down-payments) anchored in instant rails and strengthened fraud-prevention provisions expected under the PSD3/PSR framework. Parallel work packages include a move-to-production plan for factoring, subject to credit governance and liquidity stress tests; DORA-aligned resilience testing for core systems and critical vendors; and security controls uplift to reflect NIS2 baselines across dependent providers within the supply chain.

Digital identity orchestration is prepared for future eIDAS 2.0/EU Digital Identity Wallet acceptance, ensuring the architecture can consume high-assurance credentials once Member State wallets are available under the Commission’s implementation schedule.

Acceptance criteria include: successful replication of the four-party process on two additional EU corridors; documented fraud-control and payer-verification journey consistent with instant payments regulation; completion of at least one resilience test cycle (design-to-report) corresponding to DORA expectations; and a signed design-freeze for eIDAS-compatible identity flows.

Horizon 3 (18–36 months): Globalisation and integrated financial services

The final period of this roadmap completes the EU replication and prepares selective expansion to Africa, Asia, and the Americas under GSIA's supervision model. Factoring services under Growthify Markets move from pilot to scaled operation following risk acceptance and capital provisioning. Payment and identity layers are upgraded to accept eIDAS wallet credentials where available and to interoperate with third-country identity frameworks on a risk-based basis. Sustainability and due-diligence overlays are embedded into trade documentation flows in anticipation of counterparties' obligations: CBAM certificates for covered imports from 2026, CSRD-driven disclosures for in-scope firms, and CSDDD due-diligence expectations for large EU and certain non-EU companies with EU footprints.

Acceptance criteria include: corridor-level SLAs met at scale; factoring portfolio loss metrics within risk appetite; integration of emissions and due-diligence attestations where relevant to traded goods; and external assurance over controls aligned to the AML single rulebook, DORA, and data-protection requirements.

Dependencies, critical path, decision gates

The critical path runs through payment-rail enablement (instant transfers with confirmation-of-payee), AML policy harmonisation, and resilience controls. Decision Gate A (end of Horizon 1) authorises corridor replication based on settlement performance and control evidence. Decision Gate B (mid-Horizon 2) authorises factoring pilots upon completion of DORA-aligned testing and AML model validation. Decision Gate C (start of Horizon 3) authorises non-EU corridor onboarding subject to GSIA validation of legal and supervisory conditions and the availability of identity and payment assurances comparable to EU baselines.

12. Monitoring, Evaluation, and Learning (MEL)

KPI framework and evidence sources

WOSL Trade's MEL system integrates operational, financial, compliance, and impact dimensions. Service performance relies on instant-payment settlement times, with a design target aligned to the regulatory expectation of funds availability within ten seconds and parity of charges with standard transfers. Fraud-avoidance efficacy is monitored via confirmation-of-payee match rates and false-positive ratios. These indicators are traceable to payment-system logs and PSP confirmations in accordance with the EU regulation and Commission clarifications.

Financial sustainability tracks contribution margin per transaction, cross-border DSO reduction attributable to instant settlement, and, upon activation, factoring portfolio vintage loss, utilisation, and liquidity-coverage ratios. Compliance indicators include onboarding turnaround time and file completeness against AML single-rulebook requirements, suspicious-activity report (SAR) rates, and periodic screening refresh coverage; resilience indicators include time to detect, classify, and notify incidents consistent with DORA taxonomies, plus closure effectiveness from post-incident reviews.

Impact indicators focus on SME export enablement and market access: share of member transactions completed cross-border, the proportion of SMEs adopting equal-payment instruments, and the incidence of trade documentation that includes sustainability disclosures and due-diligence

attestations. For counterparties in CSRD scope, the MEL system captures the availability of ESRS-consistent data elements relevant to trade workflows; for covered goods, it monitors the presence of CBAM reporting (transitional) and certificate obligations (definitive phase from 2026).

Data model, privacy, and identity

Data ownership is allocated by role across the four parties, with WOSL Trade operating as processor for specified activities and controller for its own risk and compliance data. Personal-data processing and retention are minimised and documented; privacy-by-design principles are applied to confirmation-of-payee checks and to any future consumption of eIDAS wallet credentials when Member State implementations mature under the Commission’s legislative schedule. Audit trails are immutable and segregated by corridor.

MEL cycle and assurance

Baselines are established in Horizon 1 using the Sweden–Denmark corridor. Targets are set per horizon and revised semi-annually. Quarterly internal reviews examine KPI variance, root causes, and corrective actions; an annual external assessment validates control design and operating effectiveness with reference to the AML single rulebook and DORA, and provides management letters on NIS2-relevant cybersecurity posture. Findings feed a structured lessons-learned register with remediation owners and due dates overseen by the Compliance and Risk Officer.

Learning loops and GSIA oversight

Learning is institutionalised through GSIA’s validation and peer-review function. Corridor-level post-implementation reviews are shared to GSIA’s methods office, which issues technical notes on policy interpretation (payments, AML/CFT, resilience, identity) and on sustainability overlays (CBAM, CSRD, CSDDD) for reuse across regions. Where regulation evolves—such as the PSD3/PSR package or eIDAS wallet specifications—GSIA coordinates rule updates and change windows to avoid fragmented adoption and to keep the operating model passportable.

CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE (CSDDD)

corporatejustice.org

13. Holistic Relevance and Ecosystem Contribution

Contribution to WOSL Group mission.

WOSL Trade operationalizes border-agnostic commerce within a governed association, translating the Group’s trust, certification, and participation ethos into executable cross-border transactions. By standardizing the Seller → EUSL Sweden → EUSL Denmark → Buyer sequence, it renders “single-market” conditions for members where lawfully permissible and aligns payment, identity, and compliance primitives with prevailing EU instruments so that value moves quickly, safely, and with auditability. Where appropriate, settlement design leverages instant euro payments with confirmation-of-payee and aligned fraud controls; onboarding and monitoring conform to the emerging AML single rulebook; and operational resilience is specified to DORA-grade expectations for financial operations and critical ICT providers. These choices ensure that conduct is both efficient and evidence-based, converting regulatory evolution into a premium service experience for SMEs.

Synergies with sister sub-organisations.

WOSL (Core) supplies membership legitimacy, certification data, and grievance channels that WOSL Trade consumes as authoritative inputs in onboarding, dispute resolution, and market-access determinations. WOSL Business provides commercial interfaces, incentives, and vendor frameworks

that allow Trade to package corridor services and, in time, to embed factoring via Growthify Markets subject to risk governance. WOSL Charity uses the same transaction discipline to procure in-kind goods and services for social programs across borders with transparent documentation. WOFL contributes accredited training and micro-credentials for exporters on payments, digital identity, and compliance controls; Cupio Company aligns member incentives and cross-border benefits; S'agapo Markets provides a retail marketplace surface where Trade's settlement and compliance stack can be invoked; Orcas & Pandas and Wings of Paloma generate verified social-impact and volunteerism records that can be surfaced alongside transaction histories to evidence ethical value chains; and World News Flash (WNF) offers public transparency and narrative accountability for corridor performance and member success cases. GSIA functions as the external validator and REC-level interlocutor, aggregating standards and ensuring that the EU theatre's legal/technical stack is portable to Africa, Asia, and the Americas with appropriate adaptations.

Upstream and downstream dependencies.

Upstream, WOSL Trade depends on reliable identity, membership status, and certification assertions from WOSL Core; on PSP access to instant rails with confirmation-of-payee; and on documented AML/beneficial-ownership evidence consistent with the single rulebook. Downstream, it delivers settled transactions, immutable audit trails, standardized dispute records, and compliance artefacts to members, auditors, GSIA, and (where required) competent authorities. When Growthify Markets is activated, downstream outputs will additionally include factoring contracts, collateral documentation, and risk-adjusted performance data, each governed by resilience and third-party-risk provisions compatible with DORA and, in due course, PSD3/PSR anti-fraud and transparency enhancements.

Ecosystem contribution indicators.

Holistically, the entity's success is evidenced by measurable compression of cross-border settlement times; reduced dispute incidence; increased SME export participation; and verifiable compliance posture across corridors. Where identity wallets are available under eIDAS 2.0, the rate of high-assurance credential adoption and the reduction in onboarding cycle time constitute additional indicators of ecosystem maturation.

13.1 Interface Matrix (illustrative)

Sister Sub-Organisation	Relationship Type	Interface Description	Data/Process Touchpoints	Cadence/SLAs
World Social Label (Core)	Input/Bilateral	Membership status, certification, grievance outcomes	Membership API; certification registry; case files	Daily sync; 24h grievance updates
WOSL Business	Bilateral	Packaging of corridor services; commercial incentives	Product catalog; pricing; vendor due diligence	Quarterly portfolio reviews



Sister Sub-Organisation	Relationship Type	Interface Description	Data/Process Touchpoints	Cadence/SLAs
WOSL Charity	Output/Bilateral	Cross-border procurement for social programs	Purchase orders; delivery attestations; audits	Project-based; milestone SLAs
WOFL	Bilateral	Exporter training and accreditation	Course rosters; credential issuance	Monthly reporting
Cupio Company	Output/Bilateral	Member incentives for cross-border usage	Points ledger; benefits registry	Monthly reconciliation
S'agapo Markets	Bilateral	Marketplace checkout invoking Trade rails	Checkout API; KYC/KYB hooks	Real-time; 99.9% uptime
Orcas & Pandas	Output	Ethical chain attestations	Provenance records; badges	On event
Wings of Paloma	Output	Volunteer engagement evidence	Volunteer hours; location proofs	On event
World News Flash	Output/Bilateral	Corridor transparency and storytelling	KPI extracts; case studies	Monthly editorial window
GSIA	Input/Bilateral	Standards, validation, REC/government interfaces	Policy notes; peer review; compliance audits	Quarterly assurance

14. Geographic Structure and Market Area Strategy

Purpose and scope.

WOSL Trade applies a corridor-based geographic doctrine that balances global consistency with local legality and relevance. The doctrine defines how a standardized four-party workflow is replicated across geographies and how entry criteria, control baselines, and escalation paths are maintained as the system scales. The guiding principle is to operate only where identity, payment, AML/CFT, and resilience assurances meet or exceed the EU theatre's reference baselines, thereby preserving the portability and auditability of the model. EU baselines presently include instant euro payments with confirmation-of-payee, the AML single rulebook, and DORA-aligned resilience for financial operations and critical ICT providers; where Member State identity wallets become available, eIDAS 2.0 high-assurance credentials are integrated to reduce onboarding friction without compromising privacy.

Continental framework and hubs.

Operations are organized across four continental regions—Europe (EU theatre as reference), Africa, Asia, and Pan-Americas—with each hub responsible for adapting controls to local legal realities while preserving the canonical workflow, data model, and evidentiary standards. GSIA provides the supranational harmonization layer and REC-level liaisons so that corridor enablement remains lawful, proportionate, and implementable in each target region.

National and regional layers.

Within each continent, national EUSL entities function as the intermediary nodes in the four-party structure. They localize onboarding, tax/VAT documentation, and complaint handling while adhering to group-wide payment and identity controls. Countries are subdivided into administrative regions to maintain proximity to members and competent authorities and to ensure that service quality and response times remain within corridor SLAs even as volumes grow.

Market areas and corridor doctrine.

The smallest operational unit is the **corridor**, defined as a directional pair of market areas between two national EUSL nodes (e.g., Sweden→Denmark). Corridors are commissioned according to a **qualification rubric**:

1. **Identity assurance.** Evidence that high-assurance identity is available or can be approximated via federations compatible with eIDAS 2.0 principles; plan for progressive wallet adoption as Member State implementations mature.
2. **Payment assurance.** Access to instant rails or equivalent fast-settlement instruments with payer-verification (e.g., confirmation-of-payee) and fraud-information sharing, aligning with the EU's instant payments regime and anticipated PSD3/PSR fraud provisions.
3. **AML/CFT baseline.** Policy mapping to the AML single rulebook; if operating beyond the EU, documented equivalence or compensating controls and GSIA validation.
4. **Operational resilience.** DORA-aligned controls for financial processes and critical ICT where applicable, or functionally equivalent frameworks evidenced by testing and third-party clauses; NIS2-grade cybersecurity posture for connected providers in EU corridors.

5. **Sustainability overlays.** Where relevant to traded goods, readiness to capture CBAM, CSRD, and CSDDD artefacts in the transaction record so that counterparties can meet their obligations without duplicative workflows.

Scalability and replication.

Replication proceeds in cohorts. Cohort A completes EU intra-Nordic corridors; Cohort B extends to high-volume EU lanes (e.g., Sweden↔Germany, Denmark↔Netherlands); Cohort C introduces first non-EU corridors with GSIA oversight, provided that identity, payment, and AML/CFT baselines can be met with documented compensating controls. Each cohort is gated by **Decision Gates** anchored in control evidence and corridor-level KPIs, as defined in Chapter 11.

Governance and accountability.

Governance follows a delegated-authority model. Corridor Owners at national EUSL entities are accountable for daily operations, SLA adherence, and incident response. WOSL Trade retains stewardship of the canonical process, data schema, and vendor standards; GSIA provides second-line validation, REC/government engagement, and change-control for regulatory updates (e.g., PSD3/PSR implementation acts, eIDAS wallet specifications).

Operational implications.

Resource allocation scales with corridor density forecasts, emphasizing compliance engineering, payments operations, and identity orchestration. Technology architecture favors API-first integrations with PSPs and identity providers, immutable audit trails, and DORA-aligned incident and testing frameworks. Community legitimacy is maintained through local advisory forums and public transparency facilitated by WNF, with corridor scorecards and case studies released on a fixed cadence.

Service levels and thresholds.

Corridor SLAs codify settlement times, payer-verification response, onboarding cycle time, dispute resolution windows, and incident notification thresholds. Where instant rails are used, settlement availability targets reflect the regulation's 24/7/365 expectation with ten-second availability at the payee's account; pricing parity principles are observed in accordance with the regulation's charge-equivalence requirement, subject to PSP contracts.

Critical path and escalation.

Escalations follow a three-tier regime: operational (Corridor Owner), structural (WOSL Trade process and vendor standards), and policy (GSIA with competent-authority liaison). Non-compliances tied to AML/CFT, resilience, or data-protection obligations trigger immediate protective measures, root-cause analysis, and GSIA notification, with corridor-level suspension as a last resort where systemic risk is identified.

15. Compliance, Ethics, and Safeguarding

Ethics and conduct.

WOSL Trade operates under a codified ethics framework that mandates integrity, transparency, proportionality, and non-discrimination across all corridors. The framework embeds protected disclosure channels consistent with the EU Whistleblower Protection Directive, including confidential internal reporting lines, acknowledgment, investigation timelines, and safeguards against retaliation. Alignment with the Directive's minimum standards is evidenced in procedures for receipt, follow-up, and feedback, and in data-handling protocols for reports.



Data protection and privacy.

Personal-data processing adheres to the General Data Protection Regulation (GDPR). Role allocations distinguish controller and processor responsibilities across the four-party workflow; privacy-by-design controls are applied to confirmation-of-payee checks, onboarding/KYC, and dispute handling. Cross-border data transfers follow Chapter V GDPR rules; data minimisation, purpose limitation, and storage limitation are enforced through retention schedules and field-level access controls. Data-subject rights (access, rectification, erasure, objection, portability, restriction) are supported through standard operating procedures and logging. Where high-assurance digital identity credentials (e.g., under eIDAS 2.0/EU Digital Identity Wallet) are consumed, privacy impact assessments are updated and selective disclosure is enforced.

AML/CFT and financial-crime controls.

KYC/KYB, screening, and ongoing monitoring policies are harmonised to the EU AML “single rulebook” regulation to reduce Member-State fragmentation. Beneficial-ownership verification, risk-scoring, suspicious-activity reporting, and third-country correspondent arrangements are documented to the regulation’s standards and reviewed under GSIA’s second-line oversight. As factoring and payment features expand, obligations are reassessed against emerging technical standards and AMLA guidance.

Payments compliance.

Payment operations align with the Instant Payments Regulation for euro transfers, including the obligation for PSPs to offer instant credit transfers, parity of charges, and name/IBAN matching to mitigate misdirection and fraud. These controls are embedded into corridor SLAs and vendor contracts. The PSD3/Payment Services Regulation (PSR) legislative trajectory is monitored through GSIA; anti-fraud, data-access, and transparency provisions are integrated at design time to avoid disruptive rewrites on adoption.

Operational resilience and cybersecurity.

Operational resilience is specified to the Digital Operational Resilience Act (DORA) expectations for financial entities and critical ICT providers, including ICT risk management, incident classification/notification, resilience testing, and contractual clauses for critical third parties. Cybersecurity posture in EU corridors also reflects NIS2 baselines applicable to connected operators and supply-chain dependencies; supervisory enforcement trends on NIS2 transposition are treated as a forward-looking indicator for vendor diligence.

ESG, sustainability, and responsible trade.

Where counterparties fall under the Corporate Sustainability Reporting Directive (CSRD), trade documentation and data interfaces support the capture of ESRS-consistent fields necessary for value-chain reporting. For large undertakings in scope of the Corporate Sustainability Due Diligence Directive (CSDDD), workflows accommodate due-diligence assertions and remediation records across chains of activities. For covered imports, CBAM emissions reporting (transitional phase) and certificates (definitive phase from 2026) are integrated into the transaction record where relevant.

Safeguarding.

Safeguarding policies protect customers, employees, and third parties in all interactions, with enhanced care for vulnerable persons where services intersect with consumer finance (e.g., equal-payment instruments). Procedures include suitability and vulnerability assessments, clear hardship pathways, and prohibitions on aggressive collections. Whistleblowing, anti-retaliation, and grievance redressal link back to the ethics framework and the Directive’s standards.

16. Appendices

A. Glossary.

Defines core terms used across corridors (e.g., “confirmation of payee”, “instant credit transfer”, “high-assurance credential”, “critical ICT provider”, “beneficial owner”, “CBAM certificate”) and maps them to primary sources where definitions are fixed by law or guidance.

B. Assumptions and calculation notes.

Sets out traffic, conversion, and settlement assumptions for corridor cohorts; specifies fraud-loss expectations under instant payments with name/IBAN matching; details risk-weighted capital and liquidity assumptions for factoring; and documents compensating controls where non-EU corridors cannot yet match EU baselines.

C. KPI dictionary.

Provides canonical definitions, formulas, and data sources for settlement latency, confirmation-of-payee match rates, onboarding cycle time, SAR rate, incident MTTR/MTTD, factoring loss vintage, CBAM/CSRD/CSDDD artefact capture rate, and wallet-credential adoption where applicable.

D. Policy register.

Enumerates current policies (ethics; whistleblowing; data protection/GDPR; AML/KYC; sanctions screening; payments operations; ICT risk/DORA; cybersecurity/NIS2; third-party risk; ESG/CSRD/CSDDD; CBAM) with versioning, ownership, and review cycles aligned to legal change windows (e.g., PSD3/PSR trilogue outcomes; eIDAS wallet implementing acts).

E. Evidence base and references.

Primary legal and policy sources underpinning the design and controls of WOSL Trade (non-exhaustive):

- Instant Payments Regulation and Commission clarifications on obligations and timelines.
- Digital Operational Resilience Act (DORA) scope, application date, and Level-2 framework.
- NIS2 Directive transposition deadline and enforcement posture.
- AML Single Rulebook Regulation (EU) 2024/1624 and AMLA package.
- PSD3/PSR Council position and trilogue initiation.
- eIDAS 2.0/EU Digital Identity Wallet implementation schedule.
- CSRD scope and first-wave reporting timing; Commission policy page.
- CSDDD (Directive (EU) 2024/1760) summary and applicability.
- CBAM transitional and definitive phases.
- GDPR legal text and summary.
- Whistleblower Protection Directive (EU) 2019/1937.

F. Risk register (detailed).

Maintains a line-by-line catalogue of risks (strategic, legal/regulatory, operational, financial, technology, reputational), with causes, controls, owners, likelihood/impact ratings, early-warning indicators, and



test evidence. Particular emphasis is placed on (i) AML model drift and data-quality risk under the single rulebook; (ii) PSP/vendor dependency and DORA/NIS2 obligations; (iii) AI-assisted screening or customer support where the AI Act could apply; and (iv) sustainability documentation risk in corridors handling covered goods under CBAM and value-chains under CSRD/CSDDD.

17. Final Word

WOSL Trade converts the aspiration of border-agnostic commerce into a governed, repeatable practice. The choice to anchor operations in the EU theatre—on instant payments with confirmation-of-payee, a harmonised AML rulebook, DORA-grade resilience, and forthcoming eIDAS wallet credentials—creates a stable reference model that smaller firms can trust and larger institutions can audit. As Growthify Markets comes online, the same governance will extend to equal-payment instruments and factoring, so that liquidity and compliance move in lockstep rather than at odds. Under GSIA's supervision, corridors will replicate beyond Europe only where legal, identity, payment, and resilience assurances are commensurate with the reference stack; in this manner, scale remains lawful, impact remains measurable, and the four-party construct—Seller → EUSL (origin) → EUSL (destination) → Buyer—remains a reliable spine for member-to-member trade. The work ahead is executional and disciplined: commissioning corridors against qualification rubrics, evidencing controls to the cited standards, and publishing transparent performance through WNF so that members, partners, and authorities can see and test what the system claims. This is how WOSL Trade becomes both an instrument of commerce and a standard of conduct—portable, auditable, and fit for a world that expects speed without compromise.

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- NIS2 – Directive (EU) 2022/2555 on measures for a high common level of cybersecurity – EUR-Lex:
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