

HHSAC

HHSAC Governance Framework

Tier-1 - Public Tier-1 Document

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Verification-Only Public Surface: This document is intentionally sanitized. It provides governance and verification information sufficient for initial compliance review without exposing sensitive operational details.

Evidence-First Definition: Any reference to 'delivered' means only POD-indexed delivery recorded in the evidence register at a controlled point. HHSAC does not claim patient-level delivery or end-user receipt.

Compliance-by-Design: HHSAC does not facilitate evasion of laws, sanctions, or controls. Ambiguity triggers EX/HOLD until resolved through documented escalation.

## Purpose and Scope

This Governance Framework defines the Tier-1 governance architecture for the Humanitarian Health Supply Chain Assurance Consortium (HHSAC). It specifies the control structure, role boundaries, decision rights, and oversight mechanisms that enable audit-grade verification while limiting disclosure risk.

- Applies to Tier-1 public governance publications and the controlled Tier-2 disclosure pathway (under NDA).
- Defines segregation of duties across consortium layers to reduce key-person dependency and prevent unilateral material actions.
- Establishes escalation rules for ambiguity, exceptions, and boundary cases (EX/HOLD by default).

This document does not describe routes, depots, volumes, counterparties, payment instructions, or other sensitive operational details.

## Consortium Architecture (4 Layers)

- Layer 1 - Brand / Consortium: publishes the Tier-1 Verification Surface, sets governance requirements, and maintains the Document Registry.
- Layer 2 - Program Operator (Program Office): Aventta Trading Industrial GmbH (Berlin, Germany); owns document issuance, verification coordination, and controlled disclosure administration.
- Layer 3 - Logistics Backbone: Belka Global Group; operates logistics capability under governed controls; operational details remain Tier-2.
- Layer 4 - Risk & Compliance Oversight: Risk & Compliance Committee plus Independent Risk & Compliance Chair (External Counsel - TBD); oversees compliance posture, escalation outcomes, and Tier boundary integrity.

Each layer has bounded authority. No single layer may unilaterally authorize a material action that affects funds, shipment release, or disclosure of sensitive information.

## Core Operating Principles

- Evidence-First: claims must be supported by documented evidence at controlled points (POD-indexed).
- HOLD-by-Default: ambiguity, mismatch, or incomplete evidence triggers EX/HOLD status until resolved and documented.
- Two-Key Release Order (RO): all release/approval actions require dual sign-off by segregated roles (Authority A + Authority B).
- Tiered Disclosure: Tier-1 public surface is sanitized; Tier-2 controlled disclosure is only for authorized parties under NDA and formal request.
- Cost-Plus-Fee / Open-Book: financial governance emphasizes auditability and transparency without publishing sensitive details on Tier-1.

- Anti-Evasion Posture: no circumvention of laws, sanctions, or controls; compliance constraints are primary design requirements.

## Committees and Oversight

HHSAC uses committee-based governance to distribute authority and enforce independent review.

- Risk & Compliance Committee (RCC): reviews escalations, boundary cases, disclosure approvals, and exception closures; may impose or extend HOLD.
- Document Registry Stewardship: validates Doc IDs, versions, and checksums; manages Active/Superseded/Withdrawn states.
- Scientific & Clinical Advisory Panel: advisory input only; no signing authority; supports evidence framing and plausibility review.

Committee decisions are recorded in controlled minutes (Tier-2) and referenced by decision IDs where required.

## Roles, Authorities, and Segregation of Duties

- Program Office Lead: maintains governance documentation, runs Tier-2 access pathway, and co-signs Two-Key actions.
- Logistics Key Holder: co-signs Two-Key actions; accountable for logistics execution under controls (details Tier-2).
- Finance Key Holder (if designated): authorizes financial gates under open-book rules (details Tier-2).
- Evidence Custodian: maintains POD evidence register discipline (indexing, completeness checks, exception logging).
- Registry Custodian: maintains the authoritative Document Registry and checksum verification workflow.

All key holders must meet training/competency requirements and maintain least-privilege access per access control SOPs (Tier-2 references).

## Decision and Control Gates

Material actions (release orders, disclosure of Tier-2 artifacts, or financial approvals) are permitted only through documented gates:

- Gate 1 - Evidence Validation: confirm completeness and consistency of evidence (POD and reconciliations).
- Gate 2 - Two-Key Authorization: dual sign-off by segregated authorities for any release/approval action.
- Gate 3 - Escalation Protocol: RCC review and decision for exceptions, ambiguities, and boundary cases.
- Gate 4 - Disclosure Boundary Check: verify Tier classification and ensure minimization/redaction before any disclosure.

## Document Control and Change Management

- Doc ID: each governance document has a unique identifier and structured naming convention.
- Versioning: changes increment version numbers; superseded versions remain available for audit trail (not public unless Tier-1).
- Checksum: Tier-1 PDFs are checksum-verifiable (SHA-256) via the Document Registry.
- Status states: Active (valid), Superseded (replaced), Withdrawn (invalid; do not rely).
- Approval: Tier-1 publications require Program Office approval; Tier-2 disclosures require RCC boundary approval plus NDA and request gate.

Any discrepancy between a document copy and registry checksum must be escalated to the Evidence & Verification channel.

## Escalation and EX/HOLD Logic

- Triggers: missing POD, quantity mismatch, authorization ambiguity, location/reference inconsistencies, disclosure boundary uncertainty, or compliance red flags.
- Default action: assign EX/HOLD and freeze the related claim/action until resolution.
- Resolution: document the root cause, corrective action, and approval to clear HOLD; retain evidence trail.

Escalations are initiated via [compliance@hhsac.org](mailto:compliance@hhsac.org) and tracked under controlled records (Tier-2).

## Public Communications Boundaries

- Tier-1 language must remain bounded: verification-oriented, non-political, and non-promissory.
- Do not claim end-user/patient delivery, medical outcomes, or operational capacity.
- Direct Tier-2 requests to the Program Office and require NDA + request gate approval.