

Operator Deviations & Extensions Policy

Graduation Vaults — Ecosystem Baseline Governance

Purpose

This document defines **what operators MAY change, what operators MUST NOT change**, and **how deviations are formally approved** when deploying or maintaining Graduation Vaults.

Its purpose is to: - Prevent governance drift across schools and cohorts - Protect students, families, donors, and operators - Ensure Graduation Vaults remain institution-grade, non-custodial infrastructure

This policy applies to **all operators**, including school staff, contractors, implementation partners, and third-party service providers.

Operator Definition

An **Operator** is any individual or entity responsible for configuring, deploying, or maintaining Graduation Vault infrastructure **without holding keys or governance authority**.

Operators: - Configure SAFE + Zodiac according to approved templates - Do NOT approve transactions - Do NOT custody funds - Do NOT override governance rules

Non-Negotiable Invariants (MUST NOT CHANGE)

The following invariants are foundational. **No deviation is permitted under any circumstance.**

1. Non-Custodial Architecture

- Operators must never hold private keys
- Operators must never be added as signers
- Operators must never execute transactions

2. Donation-Only Designation

- No yield strategies
- No investment representations
- No pooling of student funds
- No discretionary asset management

3. Mandatory Parent/Guardian Signer

- A Parent or Legal Guardian must remain a mandatory signer
- The Parent role may not be removed or bypassed

4. Graduation Lock Enforcement

- Funds must remain locked until graduation eligibility
- Early withdrawals are only allowed via documented hardship policy

5. Governance Threshold Floors

- Graduation withdrawals: **minimum 3-of-4**
- Emergency withdrawals: **4-of-4**

6. Destination Safety

- Graduation payouts must go to a **Student + Parent joint SAFE**
- EOAs are not permitted as graduation destinations

Approved Operator-Level Configurations (MAY CHANGE)

The following configurations may be adjusted **without additional approval**, provided they do not violate invariants.

1. Network Selection

- Operators may select supported networks with mature SAFE + Zodiac tooling

2. Graduation Date / Time Parameter

- Graduation unlock date may be configured per student

3. Signer Identity (Within Role)

- Specific individuals filling SCHOOL, STAFF, or TRUSTEE roles may change
- Role count and structure must remain unchanged

4. Dashboard / Presentation Layer

- Branding
 - UI layout
 - Read-only analytics
 - Educational content
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Conditional Deviations (REQUIRE FORMAL APPROVAL)

The following changes require **documented signer approval** and must be recorded.

1. Threshold Increases

- Increasing thresholds above the baseline is allowed
- Decreasing thresholds is prohibited

2. Additional Guards

- Extra safety guards may be added
- Guards must not weaken existing restrictions

3. Extended Timelocks

- Longer lock periods are allowed
- Shorter lock periods are prohibited

4. Hardship Policy Customization

- Schools may define hardship criteria
- Full consensus requirement may not be reduced

Prohibited Changes (MUST NEVER OCCUR)

The following actions are **explicitly forbidden**:

- Adding operators as signers
- Allowing EOAs as graduation payout destinations
- Enabling yield, staking, or strategy execution
- Removing Transaction Guards
- Removing Roles Modifier
- Allowing withdrawals without Parent approval
- Circumventing LOCKED state restrictions

Any instance of these actions invalidates the Graduation Vault deployment.

Deviation Approval Process

When a conditional deviation is requested:

1. Deviation request is documented
2. Rationale is clearly stated
3. Impact assessment is provided

4. **All signers approve** the deviation
5. Deviation is recorded with timestamp and Safe address

Unrecorded deviations are not permitted.

Audit & Accountability

Schools and partners are encouraged to: - Maintain a deviation log - Publish deviations to stakeholders when relevant - Treat the on-chain configuration as the source of truth

Transparency is a feature, not a burden.

Enforcement

This policy is enforced through: - SAFE signer thresholds - Zodiac Roles and Guards - Institutional documentation requirements

Failure to adhere to this policy constitutes a governance breach.

Status

- Version: v1.0
 - Scope: Ecosystem-wide baseline
 - Change Control: Signer-approved only
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Graduation Vaults are infrastructure, not discretion.