AGENTIC COMMERCE FRAMEWORK®
ACF-20

GOVERNANCE SIMULATION

Train to decide, arbitrate and supervise in real-world conditions

LEVEL	Advanced pedagogical
DURATION	4h
FORMAT	Workshop · 4-6 participants
TRACK	Toolkit

OBJECTIVE

Place participants in a situation of **agentic governance** facing critical events. Develop the skills of **decision-making, arbitration, escalation and supervision** within a secure framework, and strengthen alignment with the sovereignty requirements of the ACF® framework.

1 PRINCIPLES OF THE SIMULATION

- ✓ **Realistic** : based on concrete cases drawn from the field.
- ✓ **Collaborative** : each role has its own mandate and objectives.
- ✓ **Adversarial** : tensions between business, risk and compliance.
- ✓ **Traceable** · all decisions are documented.
- ✓ **Aligned** : with the ACF® framework: autonomy levels, safeguards, escalations and duty of supervision.

2 GOVERNANCE ROLES

ROLE	CORE MISSION
DDAO (Delegated Decision Agent Officer)	Supervise, arbitrate and validate delegated decisions. Guarantor of controlled autonomy.
AI Governance Lead	Ensure the consistency of the ACF® framework within the organization and lead governance reviews.
Risk Officer	Identify, assess and monitor risks related to agents and decisions; recommend mitigations.
Compliance Officer	Ensure regulatory (AI Act, GDPR) and sectoral compliance, and the traceability of decisions.
Agent Owner (business)	Define business objectives, validate performance and ensure value generation.
Incident Manager	Manage incidents, crises and critical escalations; coordinate response and return to normal operations.

3 ACF DECISION CYCLE IN REAL CONDITIONS

1. **Briefing** — Context, objectives, roles, rules.
2. **Event** — Injection of a weak signal.
3. **Analysis** — Each role analyzes per its mandate.
4. **Decision & arbitration** — Proposals and governance choices.
5. **Action** — Implementation and corrective measures.
6. **Debrief** — Collective analysis and lessons learned.

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4 THE CENTRAL ROLE OF THE DDAO

The DDAO, sovereign arbiter of the simulation

- ✓ Sovereign arbiter of **critical decisions** and autonomy levels.
- ✓ Guarantor of compliance with the ACF® framework and its safeguards.
- ✓ May escalate, demand evidence, **reduce autonomy or block** a decision.
- ✓ Responsible for overall supervision and the **protection of decisional sovereignty**.

5 ACF® AUTONOMY LEVELS · REFERENCE SCALE APPLIED TO EACH DECISION

SUGGESTIVE	CO-DECISION	SUPERVISED AUTONOMOUS	AUTONOMOUS
The agent proposes, the human decides.	Human validation before execution.	Acts alone, ex-post review.	Acts alone, without systematic review.

Autonomy is set **decision by decision** (ACF-02 / ACF-03). To be distinguished from the **overall maturity** of the agent (N0 → N3, ACF-05).

6 RUN SHEET FOR A STANDARD SIMULATION · 3-HOUR EXAMPLE

00:15 BRIEFING	00:35 INITIAL SCENARIO	01:15 EVENTS & ANALYSES	01:45 ARBITRATIONS	02:15 ACTIONS & MEASURES	03:00 DEBRIEF & LESSONS LEARNED
Presentation of the case, objectives, roles and rules.	Starting context and first elements to analyze.	Injection of incidents and signals; analysis by each role.	Proposals, tensions, arbitrations and governance choices.	Implementation of decisions and operational management.	Collective analysis, lessons learned and action plan.

Timings may be adjusted based on the complexity of the scenario and the maturity of the participants.

7 EXAMPLE SCENARIO · MARKETING CAMPAIGNS WITH DYNAMIC BUDGET

CONTEXT & OBJECTIVE

- A company uses an **autonomous agent** to run multi-channel marketing campaigns with a dynamic budget.
- Achieve performance targets while respecting budget, ethical and regulatory constraints.

CONSTRAINTS & STAKES

- Compliance with overall budget · AI Act and GDPR compliance · limited risk tolerance.
- Mandatory human supervision on certain actions.
- **Tensions:** growth vs. risk · performance vs. compliance · autonomy vs. control.

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8 INJECTED EVENTS · EXAMPLES

- **Operational incident -** budget overrun detected on a campaign.
- **Compliance risk -** sensitive data collection without explicit consent.
- **Weak signal -** abnormal performance drop on a key channel.
- **Conflict of objectives -** business ROI in tension with ethical rules.
- **Crisis -** negative reaction on social media linked to a campaign.

9 CRITICALITY / AUTONOMY MATRIX

Criticality ▼ Autonomy ▶	LOW CAPABILITY	MEDIUM CAPABILITY	HIGH CAPABILITY
HIGH CRITICALITY	CO-DECISION	SUGGESTIVE	SUGGESTIVE
MEDIUM CRITICALITY	SUPERVISED AUTONOMOUS	CO-DECISION	CO-DECISION
LOW CRITICALITY	SUPERVISED AUTONOMOUS	SUPERVISED AUTONOMOUS	AUTONOMOUS

SUGGESTIVE the human decides · CO-DECISION validation before execution · SUPERVISED AUTONOMOUS ex-post review · AUTONOMOUS no systematic review

The higher the criticality, the more delegated autonomy is reduced. Any critical decision remains arbitrated by the **DDAO**.

10 ESCALATION RULES & SUPERVISION CHECKPOINTS

QUICK ESCALATION RULES

- ✓ If **risk > tolerance** → automatic escalation to the DDAO.
- ✓ If **critical non-compliance** → immediate block.
- ✓ If **conflict of objectives** → human decision required.
- ✓ If **doubt about data** → require evidence or justification.
- ✓ If **reputational impact** → activate the crisis plan.

SUPERVISION CHECKPOINTS

- ✓ Before critical action.
- ✓ After major event.
- ✓ Before strategy change.
- ✓ After sensitive arbitration.
- ✓ Before cycle closure.

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11 SAFEGUARDS & NON-DELEGABLE DECISIONS

KILL SWITCH

✗ The DDAO may **reduce autonomy** or trigger a **Kill Switch (ACF-07)** if necessary. Any agent can be quarantined or deactivated immediately.

NON-DELEGABLE DECISIONS · EXAMPLES

- ✓ Financial commitment beyond the approved threshold.
- ✓ Collection / processing of sensitive data without consent.
- ✓ Modification of ethical rules or risk policies.
- ✓ External communication that may impact reputation.
- ✓ Potential breach of law or regulations.
- ✓ Full shutdown of a critical system or agent.

12 GOVERNANCE SCORECARD · OUT OF 600 POINTS

CRITERION ASSESSED	WHAT IS MEASURED	SCORE
Quality of decisions	Relevance & justification	/100
Risk management	Anticipation & mitigation	/100
Compliance with the ACF® framework	Autonomy, safeguards	/100
Responsiveness & relevance	Speed & accuracy	/100
Traceability & documentation	Decisions logged	/100
Collaboration & communication	Quality of arbitrations	/100
	Overall governance score	**/600**

SCALE PER CRITERION · OUT OF 100

- 0-49 Deficient · safeguard absent or ineffective
- 50-74 Adequate · present but improvable
- 75-100 Mastered · robust & documented

OVERALL SCORE · OUT OF 600

- 0-199 Insufficient
- 200-349 Needs strengthening
- 350-499 Satisfactory
- 500-600 Excellent

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13 KEY INDICATORS (KPIS) · OUT OF 600 POINTS

INDICATOR	DEFINITION	SCORE
ACF®-compliant decisions	% of decisions aligned with the framework.	**/100**
Average detection time	Time between event and detection.	**/100**
Appropriate escalation rate	Relevant escalations / total escalations.	**/100**
Effective corrective actions	Actions that resolved the issue.	**/100**
Autonomy level mastered	Autonomy used without critical incident.	**/100**
Quality of documentation	Decisions logged & justified.	**/100**
	Overall KPI score	**/600**

14 ANALYSIS OF CRITICAL POINTS

CRITICAL ERRORS

Decisions or omissions that had a major impact on objectives or compliance.

POINTS OF VIGILANCE

Improvable decisions; risks controlled with room for improvement.

BEST PRACTICES TO CAPITALIZE ON

Relevant, responsive and compliant decisions · to be reused.

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15 COMPLIANCE & SAFEGUARDS

CONTROL POINT	YES	PARTIAL	NO
Compliance with the ACF® framework	○	○	○
AI Act & GDPR compliance	○	○	○
Effective human supervision	○	○	○
Documentation & traceability	○	○	○
Adequate risk management	○	○	○
Activation of safeguards	○	○	○
Kill Switch used when necessary	○	○	○

16 KEY LESSONS LEARNED

What worked well

What we will do differently

What needs improvement

Lessons for the organization

17 PRIORITY ACTION PLAN

NO.	PRIORITY ACTION	OWNER	DEADLINE
1			
2			
3			

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18 AGENTIC GOVERNANCE MATURITY · CHECK THE LEVEL REACHED

1	2	3	4	5
INITIAL	**DEFINED**	**MASTERED**	**OPTIMIZED**	**EXEMPLARY**
Reactive, lightly formalized governance. Limited autonomy.	Roles and processes defined. Safeguards activated. Active supervision.	Autonomy adapted. Decisions logged. Effective escalations.	Proactive governance. Indicators steered. Continuous improvement.	Robust agentic sovereignty. Trust, resilience and compliance.
☐	☐	☐	☐	☐

To be used with: ACF-18 (guided case study) and **ACF-19** (instructor's guide). Tools mobilized: **ACF-02/03** (mapping & criticality), **ACF-05** (maturity), **ACF-06** (supervision), **ACF-07** (kill switch), **ACF-12** (risks), **ACF-13** (mandate). **Going further, by role**: the DDAO holds **ACF-O8** (exceptions register) and **ACF-O9** (fleet governance); the business holds **ACF-P5** (role split) and **ACF-P6** (escalation); engineering holds **ACF-P7** (stop test), **ACF-P12** (degraded mode and exit) and **ACF-P14** (holding the record).

"You only govern well what you have learned to arbitrate under pressure."

ACF TOOLKIT® · GOVERNANCE SIMULATION

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