



# PNO Group AI Policy

## Introduction

The world around us is changing. Innovation and technology are playing an increasingly significant role in our work. At PNO Group, we recognize the value of Artificial Intelligence (AI) as a tool to enhance our services. At the same time, we are committed to ensuring that AI is used responsibly and in compliance with legal and ethical standards. This policy outlines how we use AI, the principles we uphold, and how we ensure adherence to applicable laws and regulations.

## Our AI Principles

At PNO Group, we follow four core principles in our use of AI:

### 1. Responsible use

AI is always employed in alignment with our ethical standards. We use AI to enhance our services while safeguarding the rights and interests of our clients, employees, and other stakeholders. To ensure accountability and reliability, all AI applications are subject to human oversight. This oversight is conducted by professionals trained in AI competencies and skill development. By combining human expertise with technological innovation, we maintain ethical standards and deliver trustworthy results.

### 2. Legal compliance

Our AI applications comply with relevant laws and regulations, such as the General Data Protection Regulation (GDPR) and the European Union's AI Act and adheres to its contracts with suppliers and clients. PNO is also monitoring the progress of legislation to ensure its standards remain fully aligned with the future requirements of European Union AI regulations.

### 3. Transparency and accountability

We are committed to being transparent about how we use AI in our services and ensuring accountability at every stage. We achieve this by clear communication and regular audits and reviews to ensure compliance and encourage feedback from clients and employees to share insights regarding our AI use to improve practices.

### 4. Addressing bias and fairness

At PNO Group, we acknowledge the potential risks of bias in AI systems and are committed to identifying and mitigating any such risks in our AI tools and applications. We continuously monitor AI outputs to ensure they are fair, unbiased, and inclusive, respecting the diversity of our clients, employees, and stakeholders.

## Application of AI at PNO Group

PNO Group uses a combination of third-party AI tools and internally developed AI solutions to support our processes and enhance our services. We ensure that all tools, whether developed in-house or provided by third parties, meet our high standards for confidentiality and security. Additionally, we do not use AI tools that allow third-party providers to utilize our data to train or improve their models for their own purposes, ensuring that client and company data remain strictly protected and confidential.

### **Use of third-party AI tools**

We collaborate with carefully selected technology partners and utilize paid versions of AI tools that adhere to strict requirements regarding data security, confidentiality, and ethical standards.

### **In-house development of AI**

We develop AI tools internally to align with our specific needs and standards. We take full responsibility for the careful design, implementation, and ethical use of these tools within our services.

## Our responsible use of AI

Our AI usage complies with applicable laws and internal policies, ensuring ethical, legal, and operational integrity. To promote the responsible use of AI, we have implemented comprehensive guidelines and policies, including:

- **Practical guidelines for employees**  
Providing clear guidelines for our consultants on how to responsibly incorporate AI into their daily work practices, with a focus on maintaining confidentiality and protecting client data.
- **Employee training**  
Regular training sessions to enable employees to use AI tools responsibly and effectively.
- **Monitoring and evaluation**  
We work with an AI Framework to monitor and evaluate the use of AI tools to assess their impact, ensure compliance, and identify opportunities for improvement.

## A forward-looking policy framework

This policy is regularly reviewed and updated to reflect new developments in legislation, technology, and ethical standards. PNO Group remains committed to the responsible and compliant use of AI, with innovation and trust at the forefront.

Last updated: January 2025