

POL-980_GRP_EN

RESPONSIBLE ARTIFICIAL INTELLIGENCE POLICY

POLICY

IDENTIFICATION

Category	AI – Artificial Intelligence	PD – Protezione Dati Personali
Procedure	POL-980_GRP_EN - Responsible Artificial Intelligence Policy	
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RESPONSABILITY

	Name	Role
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CLASSIFICATION

Public

TRANSLATION DISCLAIMER

This document is a translation of the source document in Italian with regulatory/organizational adjustments necessary for non-Italian Company. Therefore, differences may exist from the original. In the event of a conflict, the Italian version shall prevail, subject to the application of local regulatory requirements.

SUMMARY CHANGES

Ver.	Data	Summary Changes
00	21/06/2024	First release

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1 PURPOSE

This procedure describes the principles of Responsible AI.

2 SCOPE

The indications contained in this document apply to the entire organization of the Lutech Group.

3 DEFINITIONS AND ABBREVIATIONS

The abbreviations used within the document are indicated below.

See the Glossary for commonly used definitions.

TERM/ACRONYM	DEFINITION
CEO	Chief Executive Officer
AI / IA	Artificial intelligence
DAPM	Data Analytics Practice Manager
Lutech / Lutech Group	Lutech S.p.A. and its subsidiaries
ML Ops	A set of practices that aims to develop and maintain machine learning models in production in a reliable and efficient way
Asilomar Principles	Asilomar's principles were developed at the Beneficial AI 2017 conference and represent one of the earliest and most influential sets of AI governance principles.

4 LIABILITY

The following table indicates the responsible function and the participating functions for this process.

FUNZIONE	RESP.	PART.
Chief Executive Officer	X	
Data Analytics Practice Manager (DAPM)		X

5 DESCRIPTION

In line with the values expressed in the document *MOG-001-IT Lutech's Code of Ethics*, this document contains the principles that Lutech respects when implementing responsible artificial intelligence (AI) projects.

5.1 Our principles

AI has great positive potential for people, however, we recognize that advanced technologies can raise important challenges that need to be addressed in a clear, thoughtful and affirmative manner. These AI principles describe our commitment to developing technology responsibly and work to establish specific application areas that we will not pursue.

In this framework, to guide its action, Lutech is inspired by and draws reference from **Asilomar's principles** for beneficial AI as well as from the applicable EU regulations and interinations, implementing the **3 key principles for the use of AI algorithms and tools in its projects**:

- ❑ the **principle of knowability** of the use of AI (in relation to the rights of third parties);
- ❑ the **principle of non-exclusivity** of the algorithmic decision (so-called human in the loop);
- ❑ the **principle of algorithmic non-discrimination** (e.g. periodic verification of AI reliability and effectiveness in the light of the evolution of: technologies used, mathematical or statistical procedures appropriate for profiling);

to which Lutech supports:

- ❑ **Transparency:** We will maintain clear and open lines of communication with employees, customers, partners, and the public about how our AI applications and systems work, their capabilities, and their limitations.
- ❑ **Inclusion:** We will promote diversity within our AI development teams to ensure that multiple perspectives are taken into account in the design and implementation of AI systems, ensuring that our AI products are accessible to people with disabilities and take into account the needs of various demographics in their design.
- ❑ **Accountability:** We will adhere to strict ethical guidelines throughout the AI development lifecycle, from research and design to implementation and monitoring, establishing clear accountability mechanisms within our organization to address any ethical concerns or unintended consequences of our AI systems.
- ❑ **Impartiality:** We will implement robust measures to identify, monitor, and mitigate biases in our AI systems, ensuring fair and unbiased outcomes. We will prioritize the development of algorithms that treat all users fairly, avoiding discrimination based on race, gender, age, or other protected characteristics.
- ❑ **Reliability:** We will subject our AI systems to rigorous testing to ensure their reliability and robustness in a variety of conditions and use cases, creating channels for users to provide feedback on the reliability of our AI systems and incorporating this feedback into our ongoing development efforts.
- ❑ **Security and privacy:** We will implement state-of-the-art security measures to protect the data used by our AI systems, ensuring that it is securely stored, processed, and transmitted by adopting a *privacy-by-design* approach, integrating personal data protection considerations into the development process of our AI technologies from the outset. We will ensure that our AI systems comply with all relevant data protection laws and regulations, including GDPR and CCPA, AI Act, and provide transparent privacy policies to users.

5.2 *Goals for AI applications*

5.2.1 *Be socially responsible*

The expansion of the scope of new technologies is increasingly affecting society as a whole. Advances in AI will have a transformative impact in a wide range of fields, including healthcare, security, energy, transportation, manufacturing, and entertainment. In considering the potential development and use of AI technologies, we will take into account a wide range of social and economic factors and proceed where we believe that the likely overall benefits substantially outweigh the foreseeable risks and disadvantages.

AI also improves our ability to understand the meaning of content at scale. We will strive to make accurate, high-quality information readily available using artificial intelligence, while continuing to respect cultural, social, and legal norms in the contexts in which we operate for us and our clients. We will carefully consider when to make our technologies available on a non-commercial basis.

5.2.2 *Avoid creating or reinforcing unfair prejudices*

We understand that AI algorithms and datasets can reflect, reinforce, or reduce unfair bias. We recognize that distinguishing right from unjust prejudices is not always straightforward and differs across cultures and societies. We will seek to avoid unfair impacts on individuals, in particular those related to sensitive characteristics such as race, ethnicity, gender, nationality, income, sexual orientation, ability and political or religious beliefs by carefully respecting their rights to the protection of personal data.

5.2.3 *Be built and tested for "safety"*

We will continue to develop and apply robust "safety" and security practices to avoid undesirable outcomes that create risks of harm. We will design our AI systems and those of our Clients to be appropriately cautious and seek to develop them in accordance with best practices in AI safety research and ML Ops techniques. In appropriate cases, we will test AI technologies in constrained environments and monitor their operation after implementation.

5.2.4 *Be accountable to people*

We will design AI systems that provide appropriate opportunities for feedback, relevant explanations, and appeal. Our AI technologies will be subject to adequate human direction and control as also required by the best practices on "ML Ops".

5.2.5 *Incorporate privacy design principles*

We will incorporate the principles of personal data protection into the development and use of our artificial intelligence technologies. We will provide the opportunity for notice and consent, encourage architectures that allow the safeguarding of personal data, and provide adequate transparency and control over the use of data.

Privacy principles (to protect personal data)

- ☐ Lawfulness, Fairness and Transparency
- ☐ Purpose limitation
- ☐ Minimization
- ☐ Retention limitation
- ☐ Accuracy and updating
- ☐ Integrity and confidentiality

with particular attention to the management of training datasets, the non-exclusivity of automated decisions, transfers of personal data outside the EU and other related privacy aspects.

5.2.6 Maintain high standards of scientific excellence

Technological innovation is rooted in the scientific method and a commitment to open inquiry, intellectual rigor, integrity, and collaboration. AI tools have the potential to unlock new areas of scientific research and knowledge in critical fields such as biology, chemistry, medicine, and environmental sciences. We aspire to high standards of scientific excellence as we work to advance AI development and implement it in the projects we participate in.

We will work with a range of stakeholders to promote thoughtful leadership in this area, drawing on scientifically rigorous and multidisciplinary approaches. And we will responsibly share AI knowledge by publishing educational materials, best practices, and research that empower more people to develop useful AI applications.

5.2.7 Be made available for uses that comply with these principles

Many technologies have multiple uses. We will work to limit potentially harmful or abusive applications. As we develop and implement AI technologies, we will evaluate likely uses in light of the following factors:

Compliance factors

- ☐ Primary purpose and use: The primary purpose is the likely use of a technology and application, including the degree of close adaptability of the solution to a malicious use
- ☐ Nature and uniqueness: whether we are making available a unique or more generally available technology
- ☐ Scale: Whether the use of this technology will have a significant impact
- ☐ Nature of Lutech's involvement: whether we provide generic tools, integrate tools for customers, or develop customized solutions

5.3 AI applications that we will not pursue

In addition to the above goals, we will not design or implement AI in the following application areas:

- ☐ Technologies that cause or could cause overall damage. Where there is a material risk of harm, we will only do so if we believe that the benefits substantially outweigh the risks and incorporate appropriate safety constraints.
- ☐ Weapons or other technology the primary purpose or implementation of which is to directly cause or facilitate injury to persons.
- ☐ Technologies that collect or use information for surveillance in violation of internationally accepted norms.
- ☐ Technologies whose purpose contravenes the widely accepted principles of international law and human rights.
- ☐ As our experience in this space deepens, this list may evolve.

5.4 Actions implemented

To implement this policy, Lutech has established clear objectives to guide the responsible development of AI and machine learning within the company by internally assigning the responsibility for implementing this Policy to the *Data Analytics Practice Manager* (DAPM) as indicated in the *PSQ-000 General Organizational Structure* document.

These goals are supported by well-defined policies and procedures, which ensure compliance and adherence to ethical and legal standards.

The internal review process ensures that all AI practices are constantly monitored and improved, promoting a transparent approach and accountability for the results and decisions made.

In order to concretely verify the implementation of the principles summarized above and to spread a corporate culture of Responsible and inclusive AI that is in line with all the necessary security requirements, the Lutech group has launched a program for the development of AI solutions with the aim of supporting some of the group's internal activities, first of all to facilitate sales and pre-sales activities.

Lutech has also made available complete training material for Data Science teams through the *TOO-018 Training Management* tool, Lutech Learning. This training material covers crucial topics such as fairness, accountability, transparency, security, and interpretability in machine learning. In addition, these educational resources are accessible to all Lutech employees, fostering a corporate culture oriented towards Responsible AI. The training includes both public resources and specific content to address the particular needs and challenges of the organization.

REFERENCES AND SUPPORTING DOCUMENTS

REFERENCES

PSQ-000	General organizational structure
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ROLES AND RESPONSIBILITIES

RUO-CEO	Chief Executive Officer
RUO-DAPM	Data Analytics Practice Manager

TOOLS

TOO-018	Training Management
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