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POLICY ON THE USE OF ARTIFICIAL INTELLIGENCE TOOLS

Approved by the Board of Directors
on 24 March 2025

Filago, March 24, 2025

Policy on the Use of Artificial Intelligence Tools

This document acknowledges both the importance and the critical aspects of employing artificial intelligence (AI) tools across all business processes within the Neodecortech Group. It reaffirms the company's commitment to the ethical, responsible, and legally compliant use of this technology, particularly in accordance with **Regulation (EU) 2016/679** (GDPR) and other industry-specific regulations, aligning with the principles established in the Neodecortech Group's **Code of Ethics**.

i. Scope of Application

This policy applies to all AI systems developed, implemented, used, or considered for future adoption by the Neodecortech Group for:

- Optimization and automation of internal processes;

- Analysis of data related to customers/suppliers/business partners, markets, and trends;

- Management and enhancement of corporate information assets.

ii. Objectives

The integration of AI aims to:

- Support the development of innovative and competitive products and services;

- Optimize internal processes, reducing time and operational costs;

- Support business decisions through advanced data analysis;

- Create added value for customers, employees, and stakeholders.

iii. Ethical Principles

The use of AI will adhere to the following principles:

- Non-discrimination: Avoid biases, discrimination, or prejudice in AI systems;

- Data protection: Safeguard corporate and personal data from unauthorized access, in compliance with GDPR;

- Confidentiality: Ensure the privacy of customers, suppliers, employees, and stakeholders, respecting applicable national regulations;

- Transparency: Make AI systems understandable to all involved stakeholders.

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iv. Operational Management Model

a. Roles and Responsibilities

- Project Managers

    o Coordinate the development, implementation, and monitoring of AI systems;

    o Ensure teams comply with this policy with the support of the internal Privacy Officer.

- Corporate Privacy Officer

    o Ensures compliance with GDPR and national regulations regarding personal data processing;

    o Monitors data usage in AI systems, promoting ethical and policy-compliant practices.

- Employees and Users

    o Must adhere to this policy when using AI tools;

    o Report any anomalies or improper uses of AI systems to their designated contacts.

b. Risk Assessment Before implementing an AI system, the following risks will be assessed:

- Privacy: Compliance with GDPR to protect personal and sensitive data;

- Security: Protection against breaches, losses, or unauthorized access;

- Transparency: Clear documentation and comprehensibility of AI models, in adherence to GDPR accountability principles.
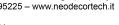
c. Data Usage

- Permitted for: Training AI models, improving services, market analysis, in compliance with Articles 6 and 9 of GDPR (legal basis and processing of special categories of data);

- Not permitted for: Automated decisions with significant effects on individuals, as per Article 22 of GDPR.

d. Transparency

- Customers will be informed about data usage through notices, in accordance with Articles 13 and 14 of GDPR;

- Rights of access, rectification, and erasure, as outlined in Articles 15-22 of GDPR, will be respected.

v. Policy Violations

- Any violations of this policy, including GDPR provisions and the Code of Ethics, will be considered serious disciplinary infractions;

- Consequences of violations and disciplinary actions: Employees and collaborators will be subject to measures outlined in internal regulations and the applicable collective labor agreement;

- Reporting to authorities: In severe cases, such as GDPR breaches or cybersecurity violations, a report will be submitted to the Data Protection Authority or competent judicial authorities.

vi. Training and Awareness

The company commits to:

- Providing training programs for employees and collaborators involved in AI system development and usage;

- Raising awareness among staff about the importance of ethical and responsible AI use;

- Promoting a culture of transparency and security among customers, suppliers, and stakeholders.