



HERO GROUP ARTIFICIAL INTELLIGENCE POLICY

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INTRODUCTION

As Artificial Intelligence (AI) continues to evolve and become more sophisticated, organizations are embracing its potential to enhance efficiency, improve decision-making, and streamline operations. However, the potential risks and ethical implications surrounding AI use cannot be overlooked. It is crucial for organizations to establish clear guidelines and policies to govern the use of AI tools and ensure they are leveraged responsibly.

HERO recognizes the transformative potential of AI and is committed to harnessing this technology responsibly. This policy establishes the ethical and operational principles that guide the deployment and use of AI within our organization.

The purpose of this Policy is to provide general guidance on the use of AI at HERO and its business partners so that they can leverage AI technologies responsibly, ethically, and in compliance with applicable laws and regulations. This policy aims to promote transparency, accountability, and trust in our AI-related activities.

The use of AI at HERO and its business partners should never compromise HERO's core values or introduce undue risk to the organization. Rather, the use of AI should be focused on improving business efficiencies and enhancing HERO's ability to fulfill its mission.

1. SCOPE OF APPLICATION

This Policy applies to HERO Group and all subsidiary and affiliate companies over which it exercises control (hereinafter collectively referred to as "**HERO**").

It applies to all directors, officers, and employees of the company (which for these purposes includes but is not limited to temporary or contract staff) regardless of citizenship and work location (hereinafter collectively referred to as "employees"). All employees are required to comply with this Policy.

Finally, the principles established in this Policy shall also apply to suppliers that develop artificial intelligence tools for Hero or that use artificial intelligence when providing services to HERO (e.g., advisors, design and marketing agencies, third party manufacturers, transportation partners...), hereinafter collectively referred to as "**Business Partners**". In both cases, it is for any employee engaging with such Business Partners to make sure they comply with this Policy, preferably through the Business Partner's adherence to our Code of Conduct or directly by contract.

2. WHAT IS ARTIFICIAL INTELLIGENCE?

For the purpose of this policy, AI refers to computer programs that can simulate human-like behavior and thinking. AI encompasses a variety of technologies, such as machine learning and neural networks. AI-based systems can identify patterns and trends from data and learn from them to make decisions and predictions.

3. COMPLIANCE WITH LAWS AND REGULATIONS

The fact that HERO operates in various countries means that the company has to coexist with a great diversity of legal systems and working and socio-cultural environments. For this reason, this Policy and its implementation will respect the legal frameworks in force in the countries where HERO operates and will serve as an inspiration to act beyond the legal requirements in those countries with less demanding regulatory frameworks.

4. HOW TO USE AI

The principles for the use of AI in our organization are designed to create an ethical, transparent and responsible framework that forms the basis for a compliant use of AI technologies to drive innovation while ensuring that all applications are in the best interest of HERO, customers, and Business Partners, as well as in line with our core values.

Acceptable use of AI

AI tools may be used only in accordance with applicable laws, regulations, and company policies and as long as the following conditions are met:

- In line with our Code of Conduct, ensure that AI tools are used with integrity, honesty, and in a manner that respects the rights, privacy, and dignity of individuals.
- Safeguard and protect sensitive company data, intellectual property, and confidential information when using AI tools.



- Adhere to licensing agreements, copyright laws, and terms of service for third-party AI tools.
- Report any suspected security breaches, misuse, or unauthorized access of AI tools, for example through our SpeakUp® whistle blowing tool.
- Make sure the use of AI is not unacceptable according to the section below.

Unacceptable use of AI: limits

HERO employees and Business Partners are prohibited from using AI systems for any of the following activities at any time:

- Using AI systems to identify or categorize individuals.
- Entering trade secrets, proprietary information, financial data, confidential information, or personal data about any individual, any business party of HERO or HERO itself, into an open AI system that is using this information to train its AI model and makes this available to other/external users. Remember that:
 - Anything typed into a public Generative AI system by a HERO or a Business Partners user can be utilized by this system to respond to future queries by members of the public.
 - Inputting any given third-party confidential information into a Generative AI-tool query risks violating the NDA or the confidentiality commitment with such third party.
- Entering any sensitive information about an individual into any AI system. “Sensitive information” includes medical, financial, political affiliation, racial or ethnic origin, religious beliefs, gender, sexual orientation, disability status, or any other part of a person’s life someone would want to keep private.

In consideration of the above-described risks, we must:

- a. Be extremely cautious about the information we input into Generative AI systems. The more information we share, the higher the risk of confidential information being exposed is.
- b. Avoid inputting information that is not aggregate or that can directly or indirectly reveal confidential or sensitive information.
- c. Before publishing anything, always review the content to avoid any confidential information is revealed.

d. In case of doubt with respect to the use of an AI tool please contact Group IT at servicedesk@hero-group.ch for validation of a specific tool in the case of HERO employees, or you HERO specific interlocutor for our Business Partners.

Responsible use of AI: ethical considerations

HERO adopts and promotes the following basic principles that are aimed to govern its actions:

- Human-centred values and fairness

HERO shall endeavor to ensure the responsible use of AI and algorithms, in compliance with the HERO's Human Rights Policy

It shall also ensure that AI systems are implemented without bias, treating all individuals and groups equitably.

- Transparency and explainability

When necessary or advisable, HERO shall provide stakeholders with a clear understanding of how AI systems make decisions and what is the outcome of using these technologies.

If personal data is being used by HERO or its employees, we shall also inform or even get consent from the owners of such data, clearly describing the circumstance and the purpose of it.

Moreover, in case HERO plans to directly create intellectual property that HERO desires to register and/or holds significant value to the organization, the Legal Office shall be previously informed so that the proper risk assessment takes place.

- Robustness, security and safety

HERO shall ensure that the AI tools and algorithms it uses in the performance of its activities respect the legal provisions on the protection of personal data applicable in each case by implementing robust data protection measures and ensuring fair and legitimate use of data.

The security of AI systems should be prioritized to prevent unauthorized access, data breaches and potential misuse.



- Accountability

HERO and its employees should be accountable for the proper functioning of AI systems and for the respect of the above principles, based on their roles, the context, and consistent with the state of art.

5. AWARENESS

HERO will ensure that all Employees and Business Partners are informed about and understand this Policy. Each employee and Business Partner shall have full and constant access to this Policy.

It is the responsibility of every manager to communicate this Policy and ensure that all employees reporting to them understand and comply with the prohibitions in this Policy. Likewise, in the case of Business Partners your HERO contact person will communicate this Policy and any update or future revisions.

6. THIRD-PARTY SERVICES

When utilizing third-party AI services or platforms, employees and Business Partners must ensure that the providers adhere to the same or very similar ethical standards and legal requirements as outlined in this policy.

7. IMPLEMENTATIONS AND MONITORING

Periodic reviews

This policy will be reviewed as needed and updated to reflect changes in technology, regulations, and ethical standards. Any changes to the policy will be communicated to all employees and Business Partners.

Incident reporting

If you have questions concerning this Policy or the related procedures, please contact Group Legal.



Employees and Business Partners have an obligation to quickly report any actual or suspected misuse of AI tools or systems. Reports should be made directly through our SpeakUp® tool.

8. ENFORCEMENT

Violation of this AI policy may result in disciplinary action. All employees and Business Partners are expected to adhere to the principles and guidelines outlined in this policy and are accountable for their actions related to AI technologies within HERO. Non-compliance with this policy may also result in legal consequences in accordance with applicable laws and regulations.

Group Legal Office