

OUR COMMITMENT IN THE USE OF ARTIFICIAL INTELLIGENCE

We are aware that Artificial Intelligence is a powerful and transformative tool, which can bring significant benefits to society but also raises questions as to how information is collected, used and protected. We want you to feel confident that the Hera Group will use it with due care and attention and that is why we want to help you understand our commitments and ethical constraints in relation to the use of AI within the Group that safeguard human rights, privacy and promote equity.

We are keen to continue to improve our communication, therefore please do not hesitate to let us know if you have any questions or requests for clarification, using the pages relating to the contact channels of the Hera Group companies.

***"Artificial intelligence is not a form of intelligence but a capacity for action. The capacity for action is to be managed, it does not learn, it does nothing, without human intelligence"*¹**

Regulatory Compliance and Accountability

The Hera Group complies with the laws and regulations relating to the use of AI.

The organisation is fully responsible for the implementation and use of AI and has established a clear system of accountability that identifies the players involved and defines corrective actions in the event of malfunctions or damage caused by AI.

More specifically, the use of AI is prohibited in the following cases:

- **For malicious purposes:** AI must not be used for purposes that may harm people or society, to engage in illegal or immoral activities, or for the pursuit of unlawful ends, which allow human behaviour, opinions, or decisions to be manipulated in a subliminal manner, or that exploit people's vulnerabilities.
- **For discriminatory purposes:** AI must not be used for discriminatory purposes or for purposes that promote discrimination.
- **For invasive surveillance purposes:** AI must not be used for the invasive surveillance of people or for purposes such as to permit widespread or indiscriminate social surveillance, including the use of remote biometric identification techniques in public spaces.

Accountability and Human Decisions

Important decisions must always be subject to human supervision, without algorithmic discrimination. AI can provide suggestions and decision-making support, however the last word must always be up to humans, especially in critical contexts. In the preparatory phase of the AI system development, in order to mitigate the prejudices that may arise from the use of the latter, we are committed to verifying the accuracy, reliability, relevance and updating of the data. We then assess the consequences of the decisions taken by the AI system, so as to understand whether or not the resulting risks are acceptable.

Transparency of decision-making processes

The Hera Group undertakes to ensure the utmost transparency in the implementation and use of AI. All automated decision-making processes must be clearly documented and understandable to the stakeholders concerned. To this end, we are committed to explaining to all the parties involved whether they are interacting with a person or with an artificial intelligence system and to illustrating the operation of the AI system in simple and clear language, despite the fact that the technical level can be very complex, especially in the context of the so-called machine learning, thereby specifying the impact of the processing activities on people: the level of information must be proportionate to the latter.

The parties involved, in any case, have the right not to be subject to decisions taken solely by AI that have legal effects against them.

Fairness and Equity

Our Group develops and uses AI techniques in such a way as to avoid discrimination based on race, gender, sexual orientation, religion or other characteristics, respecting and safeguarding People, as well as the values of diversity and inclusion. AI models need to be thoroughly tested to ensure fairness and justice in all outcomes.

¹ L. Floridi, *Agere sine intelligere. L'intelligenza artificiale come nuova forma di agire e i suoi problemi etici (Artificial intelligence as a new way of acting and its ethical issues)*, in L. Floridi, F. Cabitza (edited by), *Intelligenza artificiale. L'uso delle nuove macchine (Artificial intelligence. The use of the new machines)*, in Bompiani, Milan 2021, page 145.

The Group is committed to ensuring that AI is not used for purposes that may cause physical, psychological or social harm to individuals or communities and to managing the potential negative impact of AI on equal opportunities and prejudice reduction, by taking action in order to identify, prevent and correct sources of discrimination or disparity in AI systems.

Respect for Privacy and Data Protection

The Group undertakes to use AI ensuring the highest data security and confidentiality standards, avoiding unauthorised access or improper use of personal information and ensuring that the data collected by the AI system are adequate, relevant and limited to what is strictly necessary with respect to the purposes for which they are processed.

Adopting a risk-based approach in the adoption and development of AI technologies translates into conducting an in-depth impact assessment, identifying risks, particularly for personal data, and adopting adequate security measures so that the processing takes place in accordance with applicable laws.

The Group undertakes to assess and review the AI systems adopted over time, in order to ensure that they maintain the required security features and that their use meets expectations, thus counteracting any misuses and malfunctions, taking into account user and stakeholder feedback and available scientific and technical evidence.

For the improvement of cybersecurity, the Group adequately records any damage events directly related to the use of AI systems, thereby determining any corrections and remedial actions.

Training and Education

This policy is an important step to ensure that AI is developed and used ethically and responsibly; to this end, the Group is committed to providing ongoing training to those who interact with AI systems, first and foremost developers and users, promoting awareness and understanding of ethical risks and best practices.