

Document Title: <b>Data Ethics &amp; Digital Rights Policy</b>	Doc. #: <b>0537540</b>	Rev. #: <b>B</b>
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## Revision history

Rev.	Date YYYY-MM-DD	Description of change	Training required (Y/N)
A		First version (was not in Agile)	N
B	01 Feb. 2025	Updated with AI principles, BoD approval changed to CEO	Y

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## **1. GN DATA ETHICS & DIGITAL RIGHTS PRINCIPLES**

GN uses data and new technologies like Artificial Intelligence for various purposes, which entail benefits for GN and its customers. GN is aware of the risks and ethical concerns that increasing use of data and digital technologies in modern society gives rise to.

GN is committed to act ethically responsible and comply with ethical principles as stated herein. By actively considering digital ethics GN intends to ensure human dignity, equality, fairness, responsible use of data and technologies, transparency, and awareness by minimizing risk of algorithm bias and discrimination, lack of transparency, lack of control, and lack of responsibility and accountability.

The principles governing GN's data and digital ethics are:

### **1.1. Transparency**

GN is transparent about how and why data is used and transparent of decisions and actions taken by digital solutions such as AI.

GN collects data from a wide range of sources, including employees, customers, suppliers, business partners, social media, recruitment firms and public sources. GN exchanges data with third parties only when it is necessary to receive services from such third parties, or when required by law or orders from courts or other authorities. GN shares information such as types of data, sources of data, third parties with which GN exchanges data, and how and why such data is used in our privacy policies.

### **1.2. Human determination**

When GN uses new technologies such as AI or profiling techniques these are subject to human oversight to avoid discrimination and bias, to ensure that data is used in accordance with internal guidelines, and to verify and evidence that the data use is effective to realize the contemplated purposes and goals. GN ensures that data is collected across relevant population groups to avoid potential bias and discrimination

### **1.3. Ensuring human dignity, equality, and fairness**

GN respects human dignity, equality and fairness in our data processes. Processing of data with new technologies (such as artificial intelligence, machine learning, deep learning, and other big data technologies) may provide great benefits to individuals, organizations, and society by increasing knowledge and progressing capabilities and science. Processing of data using segmentation, profiling and personalization improves quality and relevance of services and offerings by tailoring to each user and also increases effectiveness of marketing, sales, and analysis activities. Such activities entail risks and challenges, for example risk of misuse, risks of algorithm bias and discrimination, lack of transparency, lack of self-determination and control, and lack of responsibility and accountability. GN acknowledges and considers the risks and challenges associated with the use of new technologies, segmentation, profiling and personalization and weigh the risks and challenges against the benefits when deciding if and how to use new technologies.

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## **1.4. Awareness**

GN provides internal guidelines and awareness training for relevant employees to ensure adequate competencies applicable in e.g., development and operation of new technologies to ensure an ethical appropriate use of data with respect for human rights.

## **1.5. Security**

GN has implemented appropriate organizational and technical security measures to ensure that any use of data happens in a safe, reliable and secure manner. Employees' and partners' access to data are governed by appropriate confidentiality clauses in employment or partner agreements.

## **1.6. Openness**

GN encourages employees to be open about data ethical issues. GN has established a whistleblower hotline to ensure that employees can draw attention to any factual or perceived legal or internal procedure violations. The hotline may – among other – be used in cases where employees believe that others have not complied with the principles of the data ethics. The hotline can be used anonymously and ensures confidential access to dedicated resources tasked with investigating reports.

## **1.7. Accountability**

Use of data is documented in GN. Accountability is essential to ensure that GN's data processes are based on informed decisions and allow GN to account for decisions based on the guiding principles for data ethics. Concerning novel technologies such as AI mechanisms must be put in place to assign responsibility in the event of failure or incorrect decisions.

GN will periodically review the contents of GN Data Ethics & Digital Rights Principles taking into consideration input from employees and partners, development in trends, technology, legislation and ethical values.

## **2. REFERENCES**

- European Declaration on Digital Rights and Principles
- EU AI Act Regulation (EU) 2024/1689
- GDPR Regulation (EU) 2016/679