

Artificial Intelligence Implementation Policy

Purpose of document:	<i>This policy regulates the procurement, development and deployment of artificial intelligence in Wallenius Wilhelmsen.</i>
Scope of document:	<i>This policy applies to all employees, contractors, and third parties involved in the procurement, development, deployment and management of AI Tools (as defined in section 1).</i>
Key word Search	<i>AI, artificial intelligence, IT, procurement, development, T&I</i>

Background & Objectives

This policy promotes responsible AI practices, protects data privacy, maintains security, and ensures fairness and transparency in AI operations. It ensures the legal and ethical procurement (Section 3), development (Section 4), and deployment (Sections 5 and 6) of software and/or hardware with AI capabilities at Wallenius Wilhelmsen.

Please refer to the AI Use Policy for guidance on individual use of AI Tools.

This policy supplements other Wallenius Wilhelmsen policies, including those on privacy and security. These, as well as GDPR, must be complied with in all AI-related activities.

Responsibilities

The policy document must clearly state who has what responsibility for performing tasks related to the policy area. The following roles should be addressed (as a minimum):

- **Board of Directors** oversees the policy area and approves the policy.
- **CEO** ensures alignment with the governance framework and strategy and follows up on implementation and compliance.
- **Policy Owner** ensures integration into the Integrated Management System, reviews the policy annually or when laws and regulations change.
- **Legal & Compliance** ensures adherence to applicable AI laws and internal policies.
- **IT & Operations** provides strategic and technical oversight, approves new AI Tools, and reviews data governance.
- **HR** ensures ethical and transparent use of AI in people-related processes, safeguarding fairness, trust, and alignment with organizational values.
- **Managers** ensure policy implementation and employee compliance within their areas.
- **Employees** are responsible for adhering to this policy and related procedures

What are our commitments

To ensure that implementation and use of an AI Tool adheres to Wallenius Wilhelmsen's company values, three core concepts shall be followed in all procurement, development and deployment of AI Tools:

- **Social responsibility** refers to Wallenius Wilhelmsen's responsibility "for the impacts of its decisions and activities on society and the environment through transparent and ethical behavior" (ISO26000:2010).
- **Sustainability** refers to the "state of the global system, including environmental, social, and economic aspects, in which the needs of the present are met without compromising the ability of future generations to meet their own needs" (ISO/IEC TR 24368:2022).
- **Responsible AI** is meant to result in technology that is also equitable and accountable. The expectation is that organizational practices are carried out in accord with "professional responsibility," defined by ISO as an approach that "aims to ensure that professionals who design, develop, or deploy AI systems and applications or AI-based products or systems, recognize their unique position to exert influence on people, society, and the future of AI" (ISO/IEC TR 24368:2022).

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How do we meet our commitments

To ensure that the three core values are met in the procurement, development and deployment of artificial intelligence in Wallenius Wilhelmsen, the following policy rules:

1. Definitions

For the purposes of this policy:

- **"AI"** refers to a machine-based system that infers how to generate outputs (predictions, content, decisions, etc.) based on inputs. Different AI systems vary in their levels of autonomy and adaptiveness after deployment. (OECD, 2024)
- An **"AI Tool"** may be both software and hardware with AI capabilities. AI Tools may also be services (e.g. Software-as-a-service).

2. Categories of AI

2.1. Introduction

Pursuant to law, under the AI Act, certain AI practices are prohibited, and certain AI practices require specific compliance measures. Sections 2.2. to 2.4. below list those that may be relevant to Wallenius Wilhelmsen's business.

It is important to assess which category(ies) an AI Tool falls within before procuring, developing or deploying such AI Tool.

2.2. Forbidden AI practices

The following AI practices will, with certain exceptions, be prohibited through the AI Act, and are consequently forbidden in Wallenius Wilhelmsen:

- manipulation of human behavior with the objective or effect of distorting people's behavior to the extent that they may cause themselves or others significant harm;
- evaluation or classification of people based on their social behavior or personal characteristics (social scoring), where the results of such social scoring are used to determine how people are treated;
- analysis or predictions concerning people for the purpose of predicting criminal behavior;
- creation or expansion of facial recognition databases through untargeted scraping of facial images from internet or CCTV footage;

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- interpretation of people's emotions in areas of workplace or education institutions;
- biometric categorization of people's race, political opinion, trade union membership, religious or philosophical beliefs, sex life or sexual orientation.

2.3. High risk AI practices

The following AI practices will, with certain exceptions, be considered "high-risk" pursuant to the AI Act:

- safety functions for (i) products, where the malfunctioning of such functions may endanger health and safety of persons or property, and (ii) in the management and operation of critical digital infrastructure, road traffic, or in the supply of water, gas, heating or electricity safety;
- biometrics systems for remote identification, categorization of people or emotion recognition;
- recruitment or other HR processes;
- evaluation of creditworthiness or credit scoring of people (i.e. excluding evaluation of creditworthiness or credit scoring of businesses).
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Exceptions to the "high-risk" practices are:

- the AI system is intended to perform a narrow procedural task;
- the AI system is intended to improve the result of previously completed human activity;
- the AI system is intended to detect decision-making patterns or deviations from prior decision-making patterns and is not meant to replace or influence the previously completed human assessment, without proper human review, or
- the AI system is intended to perform a preparatory task to an assessment relevant for the purposes of the use of cases listed in Annex III of the AI act.

Employees are encouraged to contact the T&I and legal & compliance departments to ensure that exceptions are in accordance with relevant legislation.

In addition to the above, fully automated decisions that have a significant effect on people may be prohibited pursuant to the GDPR.

For the above listed AI practices, specific compliance requirements apply. If Wallenius Wilhelmsen procures and/or deploys an AI Tool system that entails such practices, such compliance requirements include, amongst others, obligations to follow the instructions from the AI Tool provider, monitoring of the use of the tool and quality assurance of the input data.

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If Wallenius Wilhelmsen develops an AI Tool system that entails such practices, additional requirements regarding e.g. technical documentation, risk and quality management systems and registration with authorities apply.

Wallenius Wilhelmsen's legal department shall be consulted regarding relevant compliance requirements before developing or deploying AI Tools for the purpose of any of the practices referred to in this section 2.3.

2.4. Certain AI tools

Certain AI Tools trigger specific compliance requirements regardless of whether considered "high-risk" pursuant to section 2.3 above. Such compliance requirements may apply if Wallenius Wilhelmsen develops (either itself or through a third party) AI Tools that:

- are intended to directly interact with people; or
- generates synthetic audio, image, video or text content.

Wallenius Wilhelmsen's legal department shall be consulted regarding relevant compliance requirements before developing or deploying AI Tools for the purpose of any of the abovementioned practices.

2.5. Low risk AI practices

All AI Tools and use thereof that do not fall within any of the categories listed in section 2.2 to 2.4 above, are generally considered "low risk" in an AI regulatory perspective.

3. Procurement of AI

When procuring new software and/or hardware (including where provided as-a-service), the following steps shall be adhered to:

- **Determine AI involvement:** Clarify if the procured deliverables include AI capabilities that will be used by Wallenius Wilhelmsen. Contracts with providers should include an obligation of disclosure on the provider prior to introducing new AI capabilities in the procured deliverables. The rest of this clause **Error! Reference source not found.** is only applicable if the procured deliverables include AI capabilities that will be used by Wallenius Wilhelmsen.

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- **Impact assessment:** Conduct an impact assessment of the AI Tool based on the template included in Attachment 1. If in doubt, consult with the T&I. The impact assessment shall be approved by the T&I owner of the AI Tool and documented as part of the system documentation.
- **Contract review:** In addition to a regular contract review, the contract should address the following:
 - an obligation on the provider to always ensure compliance with the applicable regulatory requirements, including the AI Act, preferably at the cost of the provider;
 - responsibilities on the provider with respect to quality, reliability and accuracy of the AI Tool and the data it is trained on;
 - obligations to provide documentation enabling Wallenius Wilhelmsen to assess the risks related to the AI Tool.
- **Registration:** Register the AI Tool in the application asset register (ServiceNow) to ensure proper tracking and management.
- **IT & Operations approval:** Obtain approval from IT & Operations before procuring any new software and/or hardware with AI capabilities to be activated for Wallenius Wilhelmsen to ensure alignment with Wallenius Wilhelmsen's strategic objectives and risk management practices. The impact assessment to be conducted according to the above shall form the basis for such approval process.

4. Development of AI

When Wallenius Wilhelmsen develops AI (either itself or through a third party), the following steps shall be adhered to:

- **Impact assessment:** Conduct an impact assessment of the AI Tool intended to be developed based on the template included in Attachment 1. The impact assessment may need to be revisited and updated throughout the development period. If in doubt, consult with the T&I department. The impact assessment shall be approved by the system owner of the AI Tool and documented as part of the system documentation.

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- **IT & Operations approval:** Obtain approval from IT & Operations for the use of Wallenius Wilhelmsen's data in training AI Tools to ensure alignment with strategic goals and risk management. The impact assessment to be conducted according to the above shall form the basis for such approval process.
- **Ensure necessary rights to training data:** Ensure that Wallenius Wilhelmsen holds the necessary rights to data used for training of the AI Tools.
- **Controlled environment:** If AI Tools are trained on data of a confidential nature or personal data, or otherwise processes such data under development, this should be done within a cloud environment controlled by Wallenius Wilhelmsen to ensure security and compliance.
- **Diverse data sets:** Use diverse and representative datasets to train AI Tools to minimize biases and ensure fairness.
- **Compliance with AI Act:** If the AI Tool to be developed falls within any of the categories listed in section **Error! Reference source not found..** and/or **Error! Reference source not found..** of this policy, follow the legal departments' instructions with respect to compliance with relevant AI Act requirements.
- **Human review:** Implement a human review process to identify and correct biases, ensuring that AI Tools produce fair and unbiased outcomes.

5. Deployment of AI

When deploying AI Tools in Wallenius Wilhelmsen, whether developed by or on behalf of Wallenius Wilhelmsen or procured from a third party, the following steps shall be adhered to:

- **AI in customer products and services:** Before implementing AI in customer products or services, the legal department shall be consulted to assess the risks thereof and the need for updates in the relevant customer T&Cs.
- **AI in interaction with people:** Whenever AI is used to interact with people, e.g. in chatbots, it must be made clear to the user/recipient that the interaction is with AI. The user interface of the human-interacting AI Tool shall also include a clearly visible waiver stating that the output is AI generated, and that the output may contain errors and inaccuracies.

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- **Impact Assessment:** Unless an impact assessment has already been conducted as part of the procurement of the AI Tool, an impact assessment in accordance with section 3 above shall be conducted before an AI Tool is deployed.
- **Information to affected people:** Be transparent with respect to any use of AI that may have a direct impact on people. Clearly communicate that AI is being used, and the purpose for the use.
- **Review for accuracy:** Be aware that AI output may contain false information and biases; implement routines to thoroughly review for accuracy and correctness.
- **Bias mitigation:** Continuously monitor and mitigate biases in AI Tools to ensure fair and unbiased outcomes.
- **Compliance with AI Act:** If the AI Tool to be deployed falls within the categories listed in section **Error! Reference source not found.** and/or **Error! Reference source not found.** of this policy, follow the legal departments' instructions with respect to compliance with relevant AI Act requirements.
- **Controlled environment:** If the AI Tool will process data of a confidential nature or personal data, the AI Tool should be hosted within a cloud environment controlled by Wallenius Wilhelmsen to maintain security and compliance.
- **Compliance with instructions:** Take measures to ensure that AI Tools are only used in accordance with the AI Tool providers' instructions and guidelines to ensure contractual compliance.
- **Education:** Offer regular training sessions to keep employees updated on AI advancements and best practice. Provide specialized training for roles that will directly interact with or manage AI Tools to ensure proficient use and management.

6. AI in already deployed software and systems

Software and systems already deployed in Wallenius Wilhelmsen could include AI capabilities, or this may be included in future releases or versions. Wallenius Wilhelmsen aims to maintain an overview of all AI Tools used in its business. For this purpose, the following shall be adhered to for software and systems already deployed in Wallenius Wilhelmsen:

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- **Review of system documentation and release notes:** System documentation, release notes and similar should be reviewed to identify any AI capabilities. If AI capabilities are identified, the AI Tool shall be registered in ServiceNow to ensure proper tracking and management.
- **Disclosure obligations in contracts:** Upon renegotiation of contracts regarding software and systems, include an obligation of disclosure on the provider prior to introducing AI capabilities in the software or system.

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Attachment 1 to Artificial Intelligence Implementation Policy

AI Tool Impact Assessment – template for procurement/deployment of AI Tools

General Information	
AI Tool name:	[Name of the AI Tool]
Name of provider:	[Name of the provider of the AI Tool]
Department and system owner:	[Department and person/role in Wallenius Wilhelmsen responsible for the AI Tool]
Impact assessment prepared by:	[Name of person(s) having prepared the impact assessment]
Intended use:	[Brief description of what the AI Tool is intended to achieve]
License/service model:	[Specification of type of license/service model, e.g. SaaS, perpetual licenses, subscription-based licenses and relevant maintenance services]
Operational model:	[Description of whether the AI Tool will be hosted and/or operated by the provider or another external party or whether it will be hosted and/or operated by Wallenius Wilhelmsen (on premises or in a controlled cloud environment)]
AI Tool Categorization and Compliance Measures	
Description of AI capabilities:	[Description of the AI capabilities in the AI Tool that will be used by Wallenius Wilhelmsen]
AI Tool category:	[Determine if the AI Tool falls under High-Risk, Certain AI Tools, and/or Low-Risk categories as per sections Error! Reference source not found. to Error! Reference source not found. of the AI policy. If the AI Tool falls under the Forbidden category, then the AI Tool shall not be procured/deployed in Wallenius Wilhelmsen]
Compliance requirements (applicable for High Risk/Certain AI Tools):	[List specific compliance requirements required based on the AI Tool category and the relevant measures (to be) implemented to ensure compliance – to be obtained from Wallenius Wilhelmsen's legal department]
Privacy and data protection:	[Measures for protecting privacy and data, including GDPR compliance]

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Should the AI Tool be approved for use with Confidential Data?	[Recommendation with respect to such approval]
Contract Review	
Regulatory compliance	[Description of contractual provisions regarding the provider's responsibility to ensure compliance with the at all times applicable regulatory requirements for the AI Tool, including allocation of costs for measures to ensure such compliance]
Other obligations	[Brief description on the contractual responsibilities of the provider with respect to quality, reliability and accuracy of the AI Tool and the data it is trained on, as well as obligations to provide documentation enabling Wallenius Wilhelmsen to assess the risks related to the AI Tool.]
Impact Analysis	
Economic impact:	[Anticipated economic benefits or costs]
Operational impact:	[How the AI Tool will affect current operations]
Technology and Data Usage:	
Technical and data assessment	[Details about the technology and types of data used in the AI tool]
Bias and fairness:	[Evaluation of potential biases and steps taken to ensure fairness]
Transparency and explainability:	[Mechanisms in place to ensure the AI Tool's decisions are explainable and transparent]
Risk Assessment and Mitigation	
Identified risks:	[List potential risks associated with the AI Tool, including potential consequences if the AI Tool should fail, be unstable or provide output that is inaccurate or biased]
Mitigation strategies:	[Strategies to mitigate identified risks]

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Document History

Version	Date	Author	Owner	Key changes	Approved by
0.90	October 2025	SVP Global Digital Platforms	CSCDO	Major update and restructuring of the policy to ensure compliance with AI Act and other relevant legislation.	GEM
1.0	December 11 2025	SVP Global Digital Platforms	CSCDO	Final approval	BoD
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