

Artificial Intelligence Use Policy

Purpose of document:	This AI Use Policy aims to promote responsible and lawful AI practices, maintain security and ensure fairness and transparency in our AI operations.
Scope of document:	This AI policy applies to all employees and consultants at Wallenius Wilhelmsen (each a "User"). Each User is responsible for using AI Tools strictly in accordance with this policy in the performance of work for Wallenius Wilhelmsen, or when otherwise handling the data of Wallenius Wilhelmsen and/or our customers. Non-compliance with the policy may have severe consequences for Wallenius Wilhelmsen. As such, adherence to the policy is crucial. Violations of this policy may lead to corrective actions, up to and including termination.
Key word Search	AI, Copilot, artificial intelligence

Background & Objectives

Artificial Intelligence (AI) Tools (as defined in section 1) hold significant potential to enhance productivity and improve the quality of work tasks. Wallenius Wilhelmsen is a technology driven group of companies utilizing digital solutions to increase efficiency and drive innovation. With the development in AI, it's natural to incorporate these solutions in the digital toolbox. However, the use of AI Tools also entails certain risks. This AI Use Policy aims to promote responsible and lawful AI practices, maintain security and ensure fairness and transparency in our AI operations.

Please refer to the AI Implementation Policy regarding development, procurement and deployment of AI Tools in Wallenius Wilhelmsen.

Responsibilities

- **Board of Directors** is responsible for overseeing the policy area and approve the policy.
- **CEO** ensures the that the policy is aligned with our governance framework and strategy and follow up on implementation and compliance with the policy.
- **Policy Owner** ensures that the policy requirements are implemented in our Integrated Management System.
- **IT & Operations** will review the policy annually and revise as needed based on AI developments and regulatory changes.
- **IT & Operations and HR** are jointly responsible for the ownership, implementation, and review of this policy, ensuring both technical and people impacts are addressed.
- **HR** is responsible to guide organization in the implementation, communication, and ongoing review of AI-related practices, especially where these impact people, skills, and organisational culture. HR will ensure that AI adoption aligns with company values and supports employee development.
- **Managers** ensure implementation of the policy in their respective areas and follow up on employees' compliance.
- **Employees** are responsible for following the policy and related procedures. They are encouraged to provide feedback regarding the policy's effectiveness.

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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 the use 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). 0.9
- **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).

How do we meet our commitments

1. Definitions

For the purposes of this policy:

- **"AI"** refers to an engineered or machine-based system that can, for a given set of objectives, generate outputs such as predictions, recommendations, or decisions influencing real or virtual environments. AI systems are designed to operate with varying levels of autonomy.
- 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. Data sharing in AI Tools

2.1. Confidential data

Externally hosted services such as ChatGPT do often not guarantee confidentiality of the data shared by the Users. Therefore, Users are only permitted to use approved AI Tools when handling any personal data, customer data (including non-public information regarding the customer), or non-public Wallenius Wilhelmsen data ("**Confidential Data**").

If a User is in doubt with respect to whether certain data constitutes Confidential Data, the relevant data owner should be consulted. The data owner is the creator or manager of the data. This can be specific data sets or content of a system. The data owner is responsible for access management, data classification, and lifecycle management.

2.2. Approved AI Tools

Currently, the only approved AI Tool for Users' processing of Confidential Data is Microsoft 365 Copilot. The publicly available version of Copilot at copilot.microsoft.com is not approved for use with Confidential Data.

In addition to the above, the management of Wallenius Wilhelmsen may decide to implement AI capabilities in other systems and tools used in Wallenius Wilhelmsen. Unless otherwise advised for a specific system, activated AI capabilities in such other systems deployed and implemented for use in Wallenius Wilhelmsen are approved for use with Confidential Data.

2.3. Non-approved AI tools

Employees may use any AI Tool, whether approved or not, provided that the AI Tool is not used to process, store, or analyze any Confidential Data.

3. Key principles for use of AI tools

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All Users must adhere to the following key principles for use of AI Tools:

- **Human oversight:** Fully automated decisions that have a significant effect on people are prohibited unless explicitly approved by the IT & Sourcing department. AI must not be used as the sole decision-maker in recruitment, promotion, performance management, or other people-related processes. All such decisions require human review and accountability, with HR ensuring fairness and transparency. HR will ensure employees are informed about where and how AI is used in people processes, including clear communication about data usage and decision-making.
- **Review for accuracy:** AI output may contain false information and biases. Consequently, all AI output must be thoroughly reviewed for accuracy and correctness.
- **Protect data:** Interacting with AI Tools involves sharing data. If not properly secured, this data can be vulnerable to breaches, leading to privacy violations, disclosure of trade secrets and other confidential information and potential legal repercussions. Personal data and other confidential information shall not be shared with any AI Tools other than those explicitly approved pursuant to section 2.2 of this AI Use Policy. In addition, employees must comply at all times with the WalWil privacy policy when using AI.
- **Transparency and ethical considerations:** Users must ensure that the use of AI Tools to generate or manipulate content adheres to ethical principles and does not mislead recipients. Avoid using AI-generated or manipulated content in any manner that could deceive, harm, or misrepresent facts or individuals. To the extent an AI Tool is used to generate or manipulate image, audio or video content that resembles existing persons, objects, places, entities or events (a "deepfake"), then all presentations of such deepfake shall clearly disclose that the content has been artificially generated or manipulated.
- **AI literacy:** Users are encouraged to stay updated on AI development and best practices for ethical AI use and bias mitigation, and to participate in relevant training programs offered by Wallenius Wilhelmsen. T&I and HR will jointly coordinate regular AI literacy and upskilling programmes, ensuring all employees have access to training on AI tools, ethical use, and evolving skills needs.
- **Employee impact:** HR will assess and communicate how AI adoption may change job roles, required competencies, and career paths. Employees will be supported in understanding new opportunities and adapting to changes brought by AI.
- **Regulatory requirements:** There are several legal requirements that must be complied with when using AI, including data privacy laws, intellectual property laws, non-discrimination laws and AI specific legislation. Compliance with Wallenius Wilhelmsen's policies is crucial to ensure regulatory compliance. However, the relevant legal requirements vary by region, and employees must be aware that, when working in or with other jurisdictions than the EU/EEA, other regulatory requirements regarding AI use may apply. In such cases, employees are encouraged to consult with the legal department of Wallenius Wilhelmsen.
- **Incident reporting:** In the event of an AI-related incident, such as misuse of AI or sharing of Confidential Data with a non-approved AI Tool or other data breach, the T&I and cybersecurity department shall immediately be notified.
- **Escalation:** In addition to the incident reporting referred to in the bullet above, Users are encouraged to contact the information security team: Intranet - Information Security Page regarding any problems, irregularities, or concerns related to the use of AI Tools or the protection of Confidential Information.

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Document History

Version	Date	Author	Owner	Key changes	Approved by
0.90	October 2025	SVP Global Digital Platforms	CPCA	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	CPCA	Final approval	BoD