

# GENERATIVE AI – MANDATORY GROUP GUIDELINES

May 2023



## YOUR KEY TAKEAWAYS:

- Group Management has decided to limit the usage of GenAI to specific fields at this point in time. Before getting involved in Generative AI (“GenAI”) work for internal usage or for clients, **engage and align with your Business Unit (BU) / Business Line (BL) management or designated SPoCs** and relevant **Group functions** (legal, innovation, delivery, portfolio) to find out about GenAI strategy, risks and policy in your part of the business
- In general terms, when you use GenAI output, you will be responsible for it. **Carefully consider the known risks** when building GenAI solutions or when advising customers, and ensure sign-off from your BU / BL management or designated SPoCs and the local legal team
- **Make sure there is a proper assessment** of the GenAI tool’s terms and conditions that you intend to use and that you strictly comply with such terms in the performance of any business activities
- **Never use any client, third party or personal or non-public Capgemini data**, even in anonymized form, in systems that we don’t control or have appropriate contractual arrangements with
- When using GenAI: (i) **read and comply** with these mandatory Group Guidelines, (ii) **be transparent**, inform the client in writing and make sure that from a contractual standpoint you don’t need or that you already have the client’s approval to use such GenAI for that specific purpose and (iii) **clearly identify the content** that was created by GenAI when sharing it with clients or internally and the associated terms of use
- **Remember that**, similar to the use of other tools, usage of GenAI systems is prohibited for activities that are illegal as per applicable laws, fraudulent, unethical, in violation of Capgemini’s policies, or that pose a significant risk to Capgemini’s reputation

**WHY ARE YOU READING THIS:** For Capgemini, GenAI opens opportunities to complement our portfolio and to assist our way of working. New tools, business models and ideas seem to develop on a daily basis, but there is great uncertainty as to how GenAI should be used. While the underlying technology has been available for several years, the integration with chatbots has captured the attention of the public in an unprecedented way. As Capgemini, we have already delivered client projects using GenAI for many years and are currently working on new portfolio elements in line with the recent rapid rise of attention. However, the complexity and fast-paced development of these techniques, together with the yet uncertain and evolving legal and regulatory landscape, mask important risks that must be considered and properly managed. These guidelines cover the main high-level aspects to help navigate how we can safely use the technology so that risks do not occur.

Our Generative AI Group Guidelines are distributed to all employees through the common communication channels (mail and Talent intranet). All employees must read, understand and comply with it. Compliance is a condition of employment. Violations, regardless of the Group company or place of activity, may lead to disciplinary sanctions, up to and including termination of employment, as foreseen by applicable local regulations.

**GENERAL USAGE & RISKS:** First and foremost, Group Management jointly decided to limit the usage of GenAI to specific fields at this point of time. Current usage of public / open-source GenAI tools poses significant risks ranging from data privacy, confidentiality and copyright issues to ethical biases and quality control risks in the generated responses. It cannot be traced with certainty what data a GenAI tool was based on and how it uses this data to come up with a specific output. So, it is impossible to tell whether the output infringes copyrights, trade secrets, privacy rights, other third-party rights, or even if the output is accurate – simply because the sources used are not visible. Hence, a human review of every output is absolutely necessary before using that output in situations that require correctness or adherence to laws or policies and appropriate quality check and verification mechanisms must be put in place. It is important to understand that in general terms, when you use GenAI output, you will be responsible for it. Further, every prompt into a GenAI tool may be stored and reused by the company behind it, so that prompt may



already be a confidentiality breach (privacy rights, trade secrets, copyrights etc.) and your data prompted into the GenAI tool may be accessible by other third parties.

#### FUNCTIONAL RISKS

TRUST & CORRECTNESS	GenAI models have no guarantee at all about correctness, and to make it worse, will always sound confident even if factually wrong
INHERITED RISK	Building on top of a foundational model, that is not well understood, means that downstream systems inherit unknown risks from that foundation
BIAS	GenAI models will reflect the biases present in their training data and can be made to be deliberately biased with certain prompts
SUSTAINABILITY	GenAI models can require a huge amount of energy both in their initial training and their operational use

#### LEGAL RISKS

PRIVACY	Current models are often trained without having a legal basis for all training data. Using the output with such data will repeat the infringement. Further, user prompts may jeopardize privacy rights
DATA LEAKAGE	Current models often completely memorize their training data, which can leak out either accidentally or with deliberate prompting by other individuals / companies in the future
INTELLECTUAL PROPERTY	Current foundational models are often trained on data which may be copyrighted or restricted by license. GenAI models might regurgitate this copyrighted data
ETHICS	Current models are purely statistical predictors and have no inherent model of knowledge, ethics or culture. Attempts to mitigate these issues are all imperfect

Many of the risks associated with GenAI occur when using *Foundation Models*, which are large models often built by external companies, which other more specialized systems are built on top of. Very often these are closed-source, and are not transparent about how they were trained, what data they were trained on, and what risk mitigations they include. When considering including these in your solutions, **make sure that Capgemini is authorized to use it for the relevant purposes** and treat this with the same technical and legal precautions as you would with any other **third-party, non-transparent, closed-source component**. Inadequate handling of abovementioned risks may result in severe reputational damage for Capgemini as recent examples from other large corporations show.

Use cases that use GenAI techniques but that are not built on third-party foundation models are much lower risk, but you should still consider how to mitigate the risks and ensure you are following Capgemini's standard policies and ethical guidelines.

**USE CASES:** Despite the potential risks and the still various open questions, the great potential GenAI offers to our business is undeniable. There are many benefits that can be realized once GenAI is used as an assistant to our usual way of working. Three group-level use cases with respective tools are already being piloted by an expert group from across our business lines that will bring major benefits to our value creation using GenAI assistants. Additionally, the expert group is evaluating further use cases to be applied in our field of business. BU- / BL-specific use cases and offers will be developed and piloted through this channel around the organization.

**HOW TO USE IT IN AN ALLOWED SCENARIO:** Using GenAI requires different kinds of tools from private to open-source. In this context, the following principles should be applied:



- When opening a GenAI account, do it in line with your local policies. Do not share your account with others and get approval for the required subscriptions
- Some GenAI tools may be banned or restricted in certain countries. Always check with your respective local teams (legal, data privacy and security)
- Use GenAI output in line with relevant licenses, applicable laws, client contracts and Capgemini policies. Avoid use in highly regulated industries and safety-critical projects
- Only use data classified as Public ([Sec0](#)) for prompts
- Make sure, that for your use case you have put in place the required mechanisms for iteratively reviewing the output applying our common delivery quality standards
- Maintain a record of when the content was generated and the prompt that was used to generate it – even keep it in the project documentation when using it for client work
- Check whether contractual terms allow the use of GenAI (in bids, proposals and delivery), ensure the gathering of clients' consent before using GenAI in client work and deploy additional required measures to assure compliance
- Clearly identify the content that was created by GenAI when sharing it with clients or internally and the associated terms of use
- Group guidelines on GenAI will be enforced through updates in existing Capgemini policies and guidelines (e.g. repository managed policies, PACE account guidelines, security setting policies, ...), which will be updated in the upcoming weeks

**WHAT TO KEEP IN MIND:** Be aware that the Group is reflecting how, who and when we should use GenAI to complement our client-facing work. Once successfully finalized, the Group will communicate more information on how we can integrate the technology into our work to the relevant communities. In the meantime, whenever considering using GenAI, please perform an assessment of the risks listed above and get approval /permission from your relevant stakeholders (internally and externally). Additionally, assess whether your output needs to be comprehensively current and that you have the expertise to verify its correctness. The usage and regulatory space of GenAI methods and tools may vary significantly across our geographies, industries, use cases, context and capabilities and therefore have to be evaluated and approved individually. Before doing so, make sure to review our existing policies:

<a href="#">Capgemini Code of Ethics for AI</a>	<a href="#">Group Security Policy</a>	<a href="#">Cyber Security Policies</a>	<a href="#">Intellectual Property Policy</a>	<a href="#">Group Data Protection Policy</a>	<a href="#">Export Control Policy</a>
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**FURTHER INFORMATION:** As the technology is developing rapidly, these guidelines will be updated and communicated regularly. On Group-level there are three main activities with experts from across all our business lines on the way: (1) AI Futures Lab on GenAI working on Innovation, Workshops and Cooperations, (2) Group Portfolio Offerings with GenAI to be applied with and for customers, and (3) GenAI Regulatory Office for legal advice and guidance. All of them can support the BU / BL management and designated SPoCs in clarifying individualized application and guidance for GenAI.

Let's make sure we make the most of the potential of GenAI, but in a safe and controlled manner. If in doubt, better ask than risk it! If you need further information or assistance, please reach out to your local BU / BL management or designated SPoCs, local legal or data protection department.



## About Capgemini

Capgemini is a global leader in partnering with companies to transform and manage their business by harnessing the power of technology. The Group is guided everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of over 360,000 team members more than 50 countries. With its strong 55-year heritage and deep industry expertise, Capgemini is trusted by its clients to address the entire breadth of their business needs, from strategy and design to operations, fueled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2022 global revenues of €22 billion.

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