

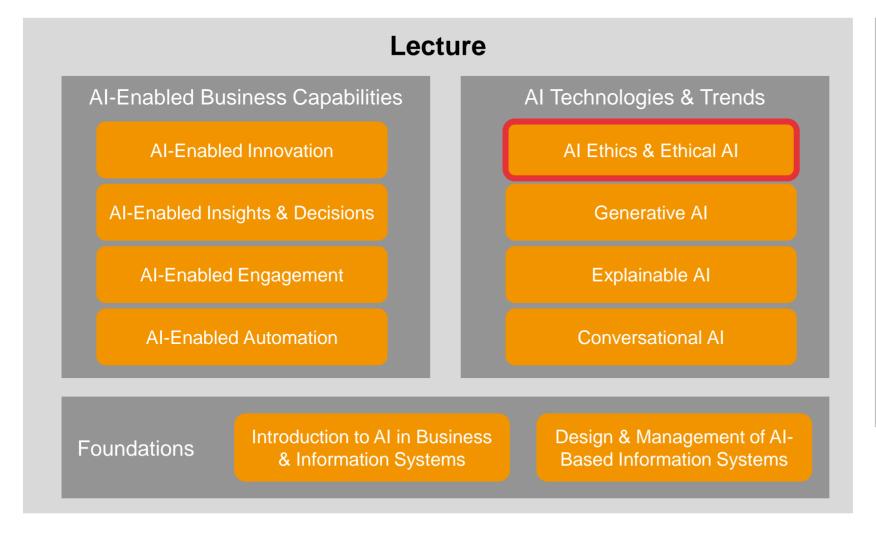
Al-Based Business Information Systems Al Ethics & Ethical Al



Prof. Dr. Ulrich Gnewuch

Course Organization











RECAP FROM LAST LECTURE:

- What are some of the challenges and risks of generative AI?
- How does generative AI differ from traditional AI?
- Which simple techniques can you use to obtain better LLM responses?

Learning Goals





- Identify common ethical concerns with AI
- Explain the legislative and principled approach to AI ethics
 - Describe the basic idea of the EU AI act
 - Name and describe key principles for ethical Al
- Discuss the benefits and challenges of the two approaches to AI ethics

Ethical Concerns with AI – Examples



AI-Enabled Automation

AI 'apocalypse' could take away almost 8m jobs in UK, says report

Almost 8 million UK jobs could be lost to artificial intelligence in a "jobs apocalypse", according to a report warning that women, younger workers and those on lower wages are at most risk from automation.

The Institute for Public Policy Research (IPPR) said that entry level, parttime and administrative jobs were most exposed to being replaced by AI under a "worst-case scenario" for the rollout of new technologies in the next three to five years.

The thinktank warned that the UK was facing a "sliding doors" moment as growing numbers of companies adopt generative AI technologies - which can read and create text, data and software code - to automate everyday workplace tasks.

https://www.theguardian.com/technology/2024/mar/27/ai-apocalypse-could-take-away-almost-8m-jobs-in-uk-says-report

Al-Enabled Engagement

Female voice assistants fuel damaging gender stereotypes, says a UN study

Products like Amazon Echo and Apple's Siri are set to sound female by default, and people usually refer to the software as "her."

Embedding bias: Most AI voice assistants are gendered as young women, and are mostly used to answer questions or carry out tasks like checking the weather, playing music, or setting reminders. This sends a signal that women

https://www.technologyreview.com/2019/05/22/65758/female-voice-assistants-fuel-damaging-gender-stereotypes-says-un-study

Ethical Concerns with AI – Examples



Al-Enabled Insights & Decisions



https://www.reuters.com/article/idUSKCN1MK0AG/

AI-Enabled Innovation

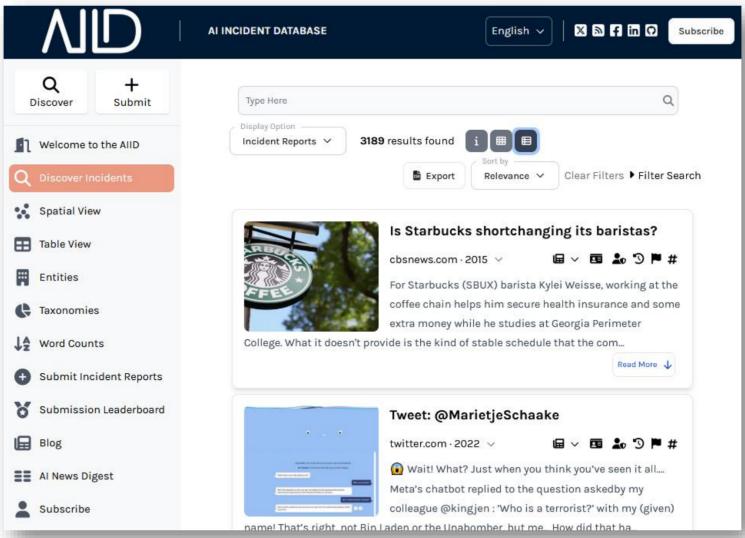
When AI Helps Generate Inventions, Who Is the Inventor?

With roots in the U.S. constitution, patent rights provide an exclusive property right in new inventions like drugs, new ways to make things like energy, and synthetic materials. However, as artificial intelligence (AI)—and specifically generative AI—are increasingly integrated across all fields such as health, education, and science, uncertainty exists in what inventions can be protected by patent rights when AI is part of the invention creation process.

https://www.csis.org/analysis/when-ai-helps-generate-inventions-who-inventor

Al Incident Database





https://incidentdatabase.ai/

Ethical Concerns with Al



Bias

Harm

Safety

Unfairness

Privacy

Unwarranted Trust

Job Displacement

Deskilling

Robustness

Errors

Lack of Transparency

Loss of Human Autonomy

Inexplicability

Lack of Control







Ethical Concerns with Al

What, in your opinion, are the top three ethical concerns, challenges, or issues with Al today and in the future?

Ethics





Ethics is the philosophical discipline interested in questions of right and wrong, good and bad, do's or don'ts.

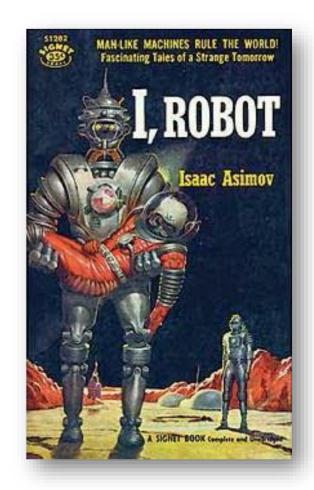
- Ethics has been a key concern in philosophy since antiquity and in many philosophical systems it has been the key question
- Ethics theories come in three groups:
 - Virtue ethics → what would a person of good character do?
 - Deontological (or duty) ethics → rules, principles, and duties
 - Consequentialist (or results-based) ethics → what will the outcomes of the action be?

Hassan et al. 2018; Nussbaum 2009

Isaac Asimov's "Three Laws of Robotics"



- The Three Laws of Robotics were formulated by sciencefiction writer Isaac Asimov and first appeared in his short story "Runaround" in 1942
 - 1. A robot may not injure a human being or, through inaction, allow a human being to come to harm.
 - 2. A robot must obey orders given it by human beings except where such orders would conflict with the First Law.
 - 3. A robot must protect its own existence as long as such protection does not conflict with the First or Second Law.
- The laws have pervaded science fiction and have also influenced thought on the ethics of AI



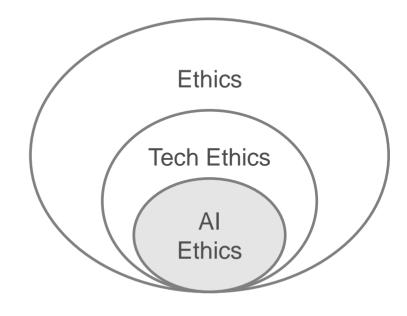
Asimov 1942





All ethics is a multidisciplinary field that addresses the ethical issues raised by the development, deployment, and use of Al.

- The central concern of AI ethics is to identify how AI can advance or raise concerns to the good life of individuals, whether in terms of quality of life, or human autonomy and freedom necessary for a democratic society
- All ethics has been mostly conceptual, with a significant emphasis on defining the principles for ethical Al



EU's AI HLEG (2019)

Two Approaches to Al Ethics



Approaches to Al Ethics

European **Rights**-Driven Regulatory Model

The EU asserts its regulatory power to protect fundamental rights, democracy, the rule of law, and environmental sustainability from high-risk AI

→ Top-down legislative regulation ("hard laws"): e.g., EU AI Act

Chinese **State**-Driven Regulatory Model

China's Al regulation has authoritarian characteristics: Supporting Al development without undermining censorship and jeopardizing the Communist Party's monopoly on political power

American **Market**-Driven Regulatory Model

The United States relies on voluntary guidance and self-regulation by tech companies

→ Bottom-up "soft laws" without legally binding force: e.g., principles for ethical Al

Bradford 2023



Legislative Approach to Al Ethics



EU Al Act: first regulation on artificial intelligence

The use of artificial intelligence in the EU will be regulated by the Al Act, the world's first comprehensive Al law. Find out how it will protect you.

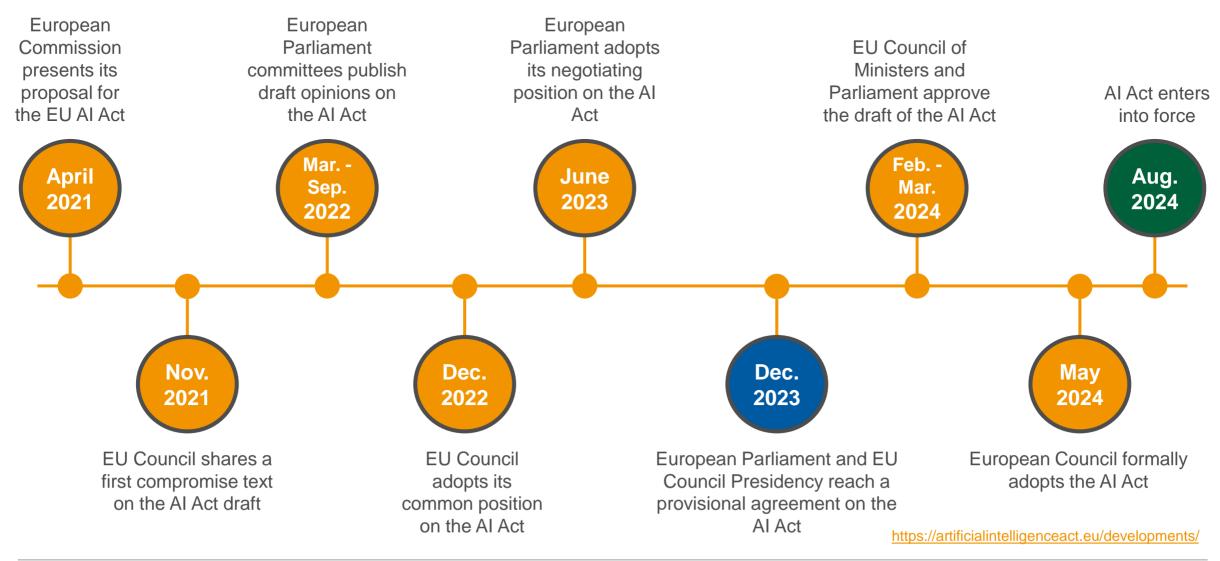


On 9 December 2023, following three-day "marathon" talks, negotiators in the Council and the European Parliament reached a provisional agreement on the AI act. The act was formally adopted by the Council on 21 May 2024 and entered into force on **1 August 2024**.

https://www.europarl.europa.eu/topics/en/article/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence

Milestones in the History of the Al Act





Difficult Negotiations on Foundation Models



EU's AI Act negotiations hit the brakes over foundation models

A technical meeting on the EU's AI regulation broke down on Friday (10 November) after large EU countries asked to retract the proposed approach for foundation models. Unless the deadlock is broken in the coming days, the whole legislation is at risk.









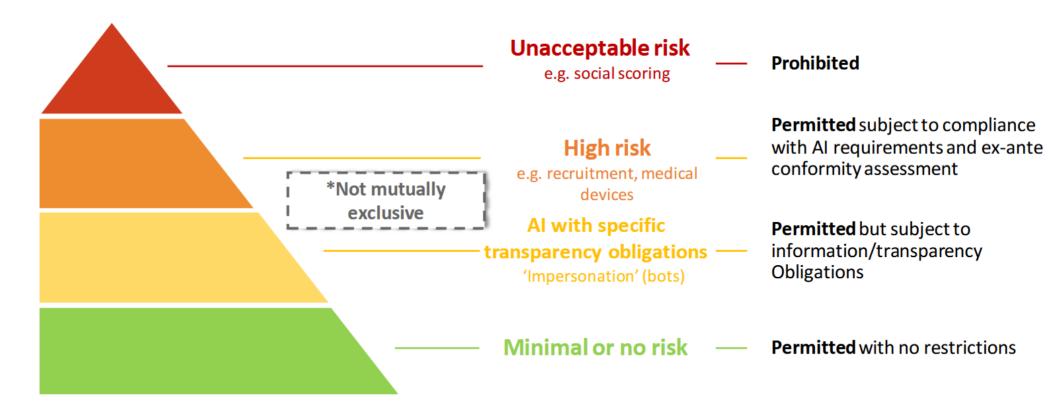
"France, Germany, and Italy pushed against any type of regulation for foundation models. Leading the charge against any regulation for foundation models in the AI rulebook is Mistral, a French AI start-up that has thrown the gauntlet to Big Tech. Cedric O, France's former state secretary for digital, is pushing Mistral's lobbying efforts, arguing that the AI Act could kill the company. Meanwhile, Germany is being pressured by its own leading AI company Aleph Alpha [..]. AII these companies fear the EU regulation might put them on a back foot compared to US and Chinese competitors."

https://www.euractiv.com/section/artificial-intelligence/news/eus-ai-act-negotiations-hit-the-brakes-over-foundation-models/

Summary of the Al Act



The EU Al Act pursues a risk-based approach to the regulation of Al and classifies
 Al into four different categories according to its risk:



https://www.ceps.eu/wp-content/uploads/2021/04/AI-Presentation-CEPS-Webinar-L.-Sioli-23.4.21.pdf

Example: Transparency Obligations



TRANSPARENCY OBLIGATIONS FOR PROVIDERS AND DEPLOYERS OF CERTAIN AI SYSTEMS

Article 50

Transparency obligations for providers and deployers of certain AI systems

1. Providers shall ensure that AI systems intended to interact directly with natural persons are designed and developed in such a way that the natural persons concerned are informed that they are interacting with an AI system, unless this is obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect, taking into account the circumstances and the context of use. This obligation shall not apply to AI systems authorised by law to detect, prevent, investigate or prosecute criminal offences, subject to appropriate safeguards for the rights and freedoms of third parties, unless those systems are available for the public to report a criminal offence.



Chatbots must not pretend to be humans!

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R168 → Article 50

Penalties for Non-Compliance with the Al Act



The penalties for non-compliance with the Al Act depend on the degree and type of non-compliance:

Non-compliance with prohibited Al system rules

EUR 35 million or up to 7% of global annual turnover

Non-compliance
with other obligations
of the Al Act

EUR 15 million
or up to 3% of global
annual turnover

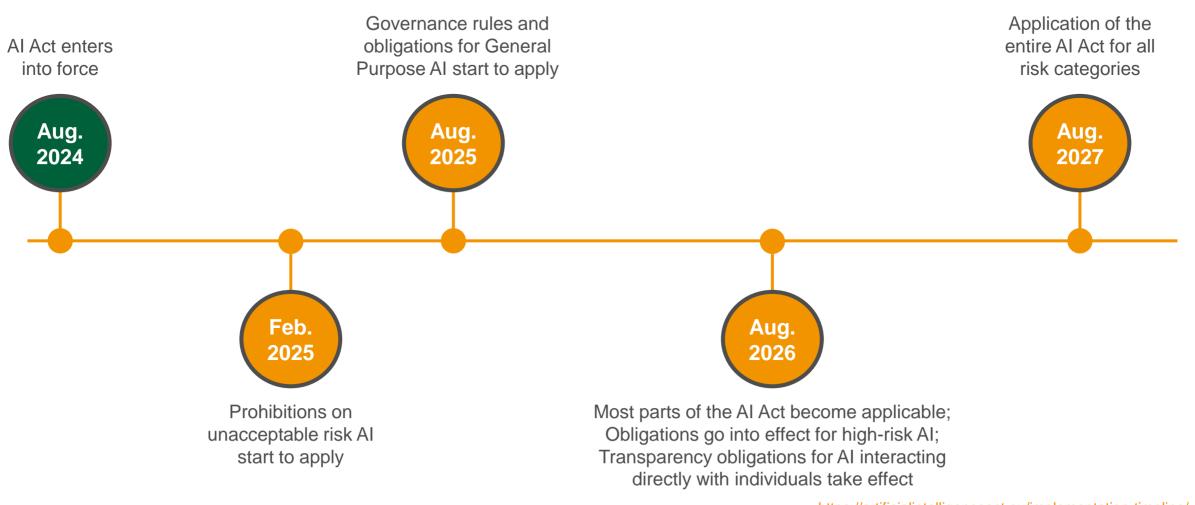
Supplying incorrect, incomplete or misleading information to regulators

EUR 7.5 million or up to 1% of global annual turnover

 $\underline{\text{https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R168}} \rightarrow \text{Article 99}$

Implementation of the AI Act





 $\underline{https://artificial intelligence act.eu/implementation-timeline/}$

Global Impact of the Al Act?



- The EU Al Act will likely shape Al legislation in other countries by setting a high-risk-based regulation standard for Al governance
- Many countries are already considering the EU AI Act as they formulate their AI policies:



François-Philippe Champagne, **Canada's**Minister of Innovation, Science, and
Industry, has stated that the country is
closely following the development of the EU
Al Act as it works on its own Al legislation



The **Japanese** government has expressed an interest in aligning its AI governance framework with the EU's approach as Japan's ruling party is expected to push for AI legislation within 2024

https://www.atlanticcouncil.org/blogs/geotech-cues/eu-ai-act-sets-the-stage-for-global-ai-governance-implications-for-us-companies-and-policymakers/



EU Al Act reaction: Tech experts say the world's first Al law is 'historic' but 'bittersweet'

EU AI Act: Sensible guardrail or innovation killer?

The Al Act: The EU's serial digital overregulation

The AI Act – The Epitome of Outdated Tech Governance — Exploring the Need for Innovative Regulation and Pathways to Modern Tech Governance

The EU's AI Dilemma: Innovation or Over-Regulation?

PACKED WITH LOOPHOLES: WHY THE AI ACT FAILS TO PROTECT CIVIC SPACE AND THE RULE OF LAW



Principled Approach to Al Ethics

Google's Al Principles





1. Be socially beneficial



2. Avoid creating or reinforcing unfair bias



3. Be built and tested for safety



4. Be accountable to people



5. Incorporate privacy design principles



6. Uphold high standards of scientific excellence



7. Be made available for uses that accord with these principles

https://ai.google/responsibility/principles/

Deutsche Telekom's Al Principles



1. Responsible



At Telekom we do different: We are responsible. Clear definition of who is responsible for which AI system.

3. Supporting



At Telekom we do different: We put our customers first. Using AI to simplify our customers' lives.

2. Careful



At Telekom we do different:
We care.
Al systems and their usage obey humandefined rules

4. Transparent



At Telekom we do different:
We are transparent.
Transparency when a customer
communicates with an Al and regarding our
use of customer data.

5. Secure



At Telekom we do different: We are secure. Our customers' data is protected against unwanted external access.

7. Trustworthy



At Telekom we do different:
We maintain control.
Continuous readiness to interfere in Al systems to prevent and/or reduce damage.

6. Reliable



At Telekom we do different: We set the framework. Good preparation precedes an excellent outcome.

8. Cooperative



At Telekom we do different:
We foster the cooperative model.
Get advantages out of a cooperative and complementary model of human-machine interactions.

https://www.telekom.com/en/company/digital-responsibility/details/artificial-intelligence-ai-guideline-524366

Bayerischer Rundfunk's Al Principles



Our Guidelines for the use of AI and Automation:

1. User Benefit

We demand proven benefits for our users and workflows when using AI systems. We deploy AI to help us use the resources that our contributors entrust us with more responsibly by making our work more efficient. We also use AI to set up new content, develop new methods for investigative journalism, support our workflows and improve our products.

Our critical reporting on Artificial Intelligence (Algorithmic Accountability Reporting) is backed up with our team's learnings from developing and using Al. We participate in the debate on the societal impact of algorithms by providing information on emerging trends, investigating algorithms, explaining how technologies work and strengthening an open debate on the future role of public service media in our society.

2. Accurate Representation of Al

We describe AI as technical systems and avoid using misleading anthropomorphic wording. Drawing analogies between AI functions and human intelligence and skills like reading, writing, or thinking is likely inaccurate and presents technology as overly powerful. Metaphors and imagery can reinforce the delusive impression of artificial beings. Therefore, we avoid using humanized images and descriptions in our publications.

3. Editorial Control & Transparency

The principle of editorial control remains mandatory with automated content. This means that only human individuals and editorial teams can be responsible for content, never systems helping to create the content. We verify data sources and thoroughly check models and software for reliability. We set up customized human workflows and technical controls for the technology we use. Results of generative AI systems have to be checked editorially beforehand.



https://www.br.de/extra/ai-automation-lab-english/ai-ethics100.html

Timeline of Ethical Al Principles





Analysis of the Al Ethics Landscape



- Jobin et al. (2019) conducted a systematic metaanalysis of 84 Al ethics documents published by government agencies (e.g., the European Union, OECD), private companies (e.g., Microsoft, SAP), and research institutions (e.g., ACM, IEEE) from different geographic regions
- The principles of **responsibility**, **justice and fairness**, transparency, non-maleficence, and privacy were referenced in more than half of all documents, indicating an emerging global convergence across stakeholders on the importance of these five principles

machine intelligence

PERSPECTIVE

The global landscape of AI ethics guidelines

Anna Johin, Marcello Jenca and Effy Vavena

is debate about both what constitutes 'ethical Al' and which ethical requirements, technical standards and best practices are

rtificial intelligence (AI), or the theory and development of

these concerns by developing ad hoc expert committees on AI, often mandated to draft policy documents. These committees or include the High-Level Expert Group on Artificial Intelligence guidelines for AI and analyses whether a global convergence is committee on Artificial Intelligence of the UK House of Lords. holders involved in the advancement of ethically resp As part of their institutional appointments, these committees have innovation in AI. produced or are reportedly producing reports and guidance documents on Al. Similar efforts are taking place in the private sector. Methods sepecially among corporations who rely on AI for their business. In
2018 alone, companies such as Google and SAP publicly released AI
containing soft-law or non-legal norms issued by organizations

Reports and guidance documents for ethical AI are instancomputer systems able to perform tasks normally require. ing human intelligence, is widely heralded as an ongo"revolution" transforming science and society altogether¹.

passed by the legislatures to define permitted or prohibited conwhile approaches to AI such as machine learning, deep learning and artificial neural networks are reshaping data processing and nature. Such documents are aimed at assisting with—and have natural neural neural networks are resinging data processing and nature source decliners are almost a assisting with a malysis', autonomous and semi-autonomous systems are being been observed to have significant practical influence on-decision nereasingly used in a variety of sectors including healthcare, making in certain fields, comparable to that of legislative norms' ransportation and the production chain. In light of its power-ial transformative force and profound impact across various soci-ial transformative force and profound impact across various societal domains. AI has sparked ample debate about the principles onstrate not only the need for ethical guidance, but also the strong nd values that should guide its development and use. Fears interest of these stakeholders to shape the ethics of AI in ways that that AI might ignorable jobs for human workers? he misused meet their respective priorities 1423. Specifically the private sectors y malevolent actors", elude accountability or inadvertently disinvolvement in the AI ethics arena has been called into questio pinate hias and thereby undermine fairness" have been at the for potentially using such high-level soft policy as a portmanteau refining the control of the recent scientific literature and media coverage.

to either render a social problem technical social problem technical of the recent social problem technical social pro bly in meta-assessments¹⁴⁻¹⁶ or in relation to systemic riskst^{1,16} produced ethical guidance on AI, the content of this guidance itself and unintended negative consequences such as algorithmic bias is of interest. Are these various groups converging on what ethidiscrimination 19-21.

al AI should be, and the ethical principles that will determine the Valenment of AI? If they diverge, what are their differences and

ppointed by the European Commission, the expert group on Al emerging regarding both the principles for ethical Al and the a Society of the Organisation for Economic Co-operation and Development (OECD), the Advisory Council on the Ethical Use of Artificial Intelligence and Data in Singapore, and the Select—and intergovernmental organizations, and other relevant stake-

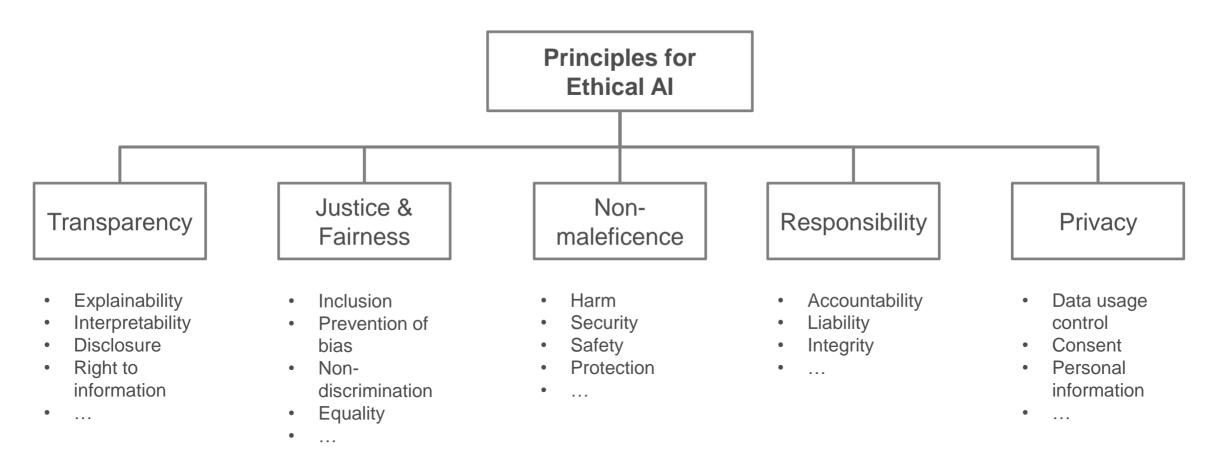
guidelines and principles. Declarations and recommendations have also been issued by professional associations and non-profit organizations such as the Association of Computing Machinery (ACM),
A scoping review is a method aimed at synthesizing and mapping
Access Now and Amnesty International. This proliferation of softlaw efforts can be interpreted as a governance response to advanced complex or beterogeneous areas of research 27,28. Given the absence earch into AI, whose research output and market size have drasa protocol for discovery and eligibility, adapted from the Preferred

lealth Ethics and Policy Lab Department of Health Sciences and Technology ETH Zurich Zurich Switzerland *e-mail: effyywena@hest.ethy.o

Jobin et al. 2019

Five Key Principles for Ethical Al





Jobin et al. 2019

Transparency



Al actors "should provide meaningful information, appropriate to the context [...] to foster a general understanding of Al systems, to make stakeholders aware of their interactions with Al systems [...] to enable those affected by an Al system to understand the outcome, and, to enable those adversely affected by an Al system to challenge its outcome [...]"

Possible scenarios:

- Explaining the features of a machine learning model that led to a specific prediction (→ see XAI lecture)
- Telling customers that they are interacting with a chatbot and not with a human service employee
- Disclosing how content was generated/improved using ChatGPT (e.g., parts of your master thesis)
- **—** ...

https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0449

Justice & Fairness



The development, deployment and use of AI systems must be fair. [...] fairness has both a substantive and a procedural dimension. The substantive dimension implies a commitment to: ensuring equal and just distribution of both benefits and costs, and ensuring that individuals and groups are free from unfair bias, discrimination and stigmatization. [...] The procedural dimension of fairness entails the ability to contest and seek effective redress against decisions made by AI systems and by the humans operating them. [...]

- "Fair Al"
- Possible scenarios:
 - Making sure that there are no gender or racial biases in job application decisions made by Al
 - Allowing customers to challenge (unfair) loan or credit decisions made by Al
 - ...

https://digital-strategy.ec.europa.eu/en/library/ethics-guidelines-trustworthy-ai

Non-Maleficence



"Al systems should not be used in ways that cause or exacerbate harm, whether individual or collective, and including harm to social, cultural, economic, natural, and political environments."

- Possible scenarios:
 - Protecting democracy from Al-generated deepfakes and misinformation
 - Reducing the significant energy consumption of generative AI training processes
 - **–** ...

https://unsceb.org/sites/default/files/2023-03/CEB_2022_2_Add.1%20%28AI%20ethics%20principles%29.pdf

Responsibility



"[...] The ethical responsibility and liability for the decisions and actions based in any way on an AI system should always ultimately be attributable to AI actors corresponding to their role in the life cycle of the AI system. Appropriate oversight, impact assessment, audit, and due diligence mechanisms [...] should be developed to ensure accountability for AI systems and their impact throughout their life cycle."

- "Responsible AI"
- Possible scenarios:
 - Putting the responsibility on doctors to verify the suggestions of an Al-based diagnosis tool before applying them to a patient
 - Holding car manufacturers, software developers, and operators accountable when an autonomous vehicle is involved in an accident
 - **–** ...

https://unesdoc.unesco.org/ark:/48223/pf0000380455.locale=en



"People should have the right to access, manage and control the data they generate, given AI systems' power to analyze and utilize that data."

- Possible scenarios:
 - Refrain from using personal data scraped from the web to train Al models
 - Making sure that AI systems do not leak sensitive user or company data
 - **–** ...



https://futureoflife.org/open-letter/ai-principles/

Criticism of Ethical Al Principles



Principles alone cannot guarantee ethical AI

Nature Machine Intelligence 1, 501–507 (2019) | Cite this article

21k Accesses | 579 Citations | 270 Altmetric | Metrics

Abstract

Artificial intelligence (Al) ethics is now a global topic of discussion in academic and policy circles. At least 84 public–private initiatives have produced statements describing high-level principles, values and other tenets to guide the ethical development, deployment and governance of Al. According to recent meta-analyses, Al ethics has seemingly converged on a set of principles that closely resemble the four classic principles of medical ethics. Despite the initial credibility granted to a principled approach to Al ethics by the connection to principles in medical ethics, there are reasons to be concerned about its future impact on Al development and governance. Significant differences exist between medicine and Al development that suggest a principled approach for the latter may not enjoy success comparable to the former. Compared to medicine, Al development lacks (1) common aims and fiduciary duties, (2) professional history and norms, (3) proven methods to translate principles into practice, and (4) robust legal and professional accountability mechanisms. These differences suggest we should not yet celebrate consensus around high-level principles that hide deep political and normative disagreement.

https://www.nature.com/articles/s42256-019-0114-4

The uselessness of AI ethics

Original Research | Open access | Published: 23 August 2022
Volume 3, pages 869–877, (2023) Cite this article

Luke Munn 🖂

Abstract

As the awareness of AI's power and danger has risen, the dominant response has been a turn to ethical principles. A flood of AI guidelines and codes of ethics have been released in both the public and private sector in the last several years. However, these are *meaningless principles* which are contested or incoherent, making them difficult to apply; they are *isolated principles* situated in an industry and education system which largely ignores ethics; and they are *toothless principles* which lack consequences and adhere to corporate agendas. For these reasons, I argue that AI ethical principles are useless, failing to mitigate the racial, social, and environmental damages of AI technologies in any meaningful sense. The result is a gap between high-minded principles and technological practice. Even when this gap is acknowledged and principles seek to be "operationalized," the translation from complex social concepts to technical rulesets is non-trivial. In a zero-sum world, the dominant turn to AI principles is not just fruitless but a dangerous distraction, diverting immense financial and human resources away from potentially more effective activity. I conclude by highlighting alternative approaches to AI justice that go beyond ethical principles: thinking more broadly about systems of oppression and more narrowly about accuracy and auditing.

https://link.springer.com/article/10.1007/s43681-022-00209-w

Key Challenges of Ethical Al Principles









Abstract and high-level:
Large gap between
principles and their practical
implementation

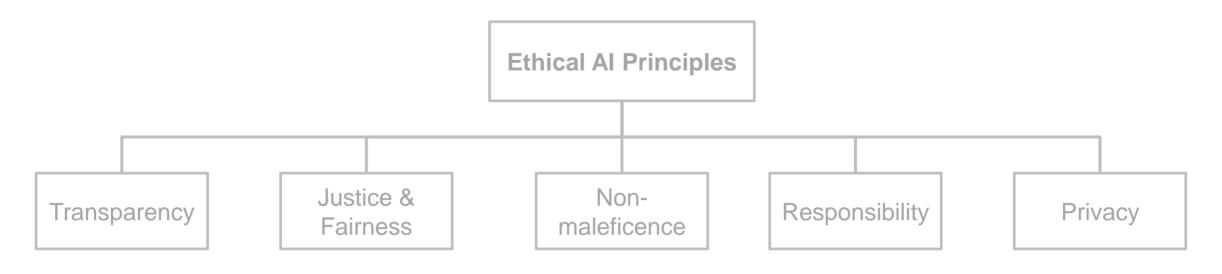
Conflicting: Tensions between different principles

"Toothless": Lack of consequences and mechanisms to enforce compliance

Mittelstadt 2019; Munn 2023

Principle-Practice Gap in Al Ethics







How can organizations translate these abstract, high-level principles into actionable strategies?

Jobin et al. 2019

Research Example: RPA Implementation Case Study



- Case study at a German-based energy service provider
- Over a period of two and a half years, 45 robotic process automation (RPA) bots were implemented to automate many back-office processes (e.g., customer service, billing)
- These RPA bots enabled the automated processing of more than 200,000 back-office transactions per year → equivalent to 5 full-time employees
- Many ethical concerns and challenges: job displacement, lack of control, loss of human autonomy, errors, ...
- How to address these challenges based on ethical Al principles?







Schulte-Derne & Gnewuch 2024

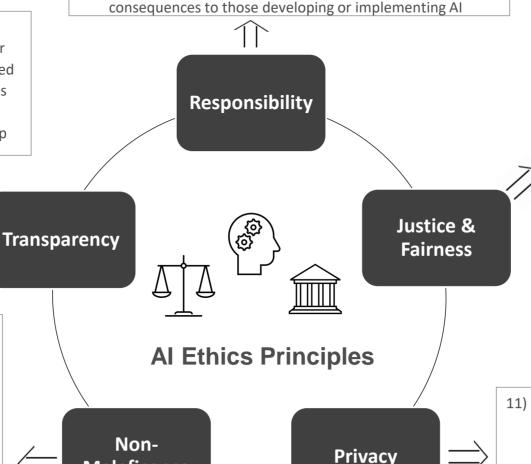
Recommendations for Translating Ethical Al Principles into Practice

Maleficence

UNIVERSITY OF PASSAU

- 5) Enable open and honest communication from trusted peers to allow employees to discuss their concerns and ask questions without feeling judged
- Make the invisible visible by providing employees the opportunity to observe the AI at work
- 7) Keep employee representation bodies in the loop

- 1) Define and assign roles for selecting, implementing, supervising, and optimizing Al-automated processes
- 2) Avoid delegating the overall responsibility for (negative) consequences to those developing or implementing Al



- Strive for a fair distribution of Al's benefits and costs among all employees
- 4) Understand and address personal tensions in a diverse workforce with different socio-demographic backgrounds and levels of technical expertise

- Help employees find strategies to cope with their fears
- Avoid overwhelming employees by taking away all their routine tasks before they have the opportunity to develop confidence in their new responsibilities
- 10) Examine who else besides the organization's employees is impacted by the AI implementation

11) Involve data protection officers before investing time and effort in a new AI initiative

Schulte-Derne & Gnewuch 2024

Example: Transparency



Strategy #6: *Make the invisible visible by providing employees the opportunity to observe the AI at work*

- The RPA team set up the RPA software on a normal desktop PC placed in one of the offices and invited employees and works council members to observe its functioning at any time
- This not only reduced employees' uncertainty and works council members' concerns, but also turned fear into curiosity



Teddy Bear "Robbie" Sitting in Front of the RPA Workstation

Schulte-Derne & Gnewuch 2024



Legislative vs. Principled Approach to Al Ethics

In your opinion, which approach to AI ethics is better? Should governments formally regulate AI? Should we trust companies to follow their ethics principles?

→Discuss these questions with a partner for ~5 minutes and be ready to share your opinions

Key Takeaways From This Lecture

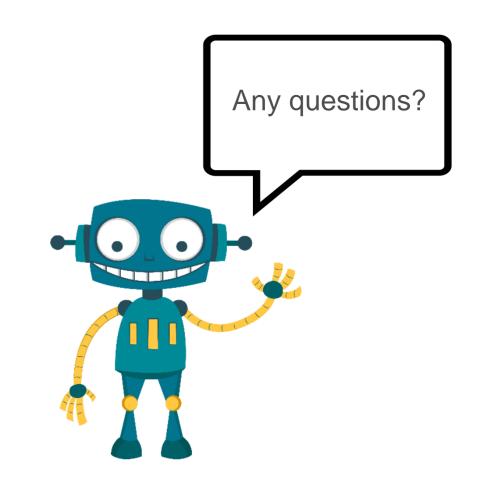


- The development, deployment, and use of AI raise many ethical concerns, such as job displacement, bias, lack of control, and privacy issues
- The field of AI ethics aims to address these concerns by exploring and guiding what is morally right or wrong
- There are two main approaches to AI ethics
- 1) The legislative approach focusing on top-down regulation
 - Example: EU Al Act
- 2) The principled approach focusing on bottom-up "soft laws"
 - Example: Ethical Al principles such as transparency, justice and fairness, and responsibility
- Both approaches have their benefits and challenges:
 - Regulation may impose inflexible requirements and hinder innovation
 - Principles are non-binding and difficult to put into practice





Thank you for your attention!



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