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# AI policy

## Ethical and compliance guidelines for cBrains AI development and deployment

| Version | Changes | Change by / Date | Approved by / Date |
|---|---|---|---|
| 1.1 | Wording regarding ISAE controls changed. | FSG/21.10.25 | EJJ+LMC/10.11.25 |
| 1.0 | Original document established. | FSG/28.08.25 | EJJ/02.10.25 |

# 1 Content

# 2 Introduction

This policy document is relevant for all employees at cBrain and should be considered throughout all stages of the AI lifecycle: from design, development, implementation, live operation, to end-of-life.

The following chapters outline the overall considerations and AI-specific considerations that guide our approach to ethical AI development.

When in doubt about any ethical considerations or compliance issues, raise the concern with the Data Ethics Board by bringing it to the attention of Product Management, att: Frejdie Søndergaard-Gudmandsen.

# 3 General Considerations

## 3.1 Ethical focus

Ethical considerations are fundamental to ensuring that our AI solutions benefit society and align with our values. In addition, it is a law requirement for Danish companies listed on the stock exchange to ensure data ethical considerations. cBrains policy on Data Ethics are available on cBrains website: https://www.cbrain.com/investor/corporate-governance#policies-and-procedures

Examples, where AI can be deployed with an ethical focus is if the solution can strengthen the democratic system, ensure government efficiency, provide better public services to citizens or companies or accelerate the green transition. As a minimum the solution should not have any significant negative impact in these areas.

## 3.2 Compliance

cBrain has a focus on regulation and compliance requirements relevant to the problem area and type of solution. When working with compliance, then the aim is not to create a 'paper shield', but to strengthen the overall ethical focus on our activities by operating within the standardized legal frameworks relevant to the solution. We therefore adhere to the intent and not just the letter of the law, when dealing with compliance.

### 3.2.1 EU based - International outlook

cBrains solutions are based on a Danish and European baseline for compliance. When working with international customers outside the EU, different compliance requirements can be relevant. cBrains data ethical standards are however mandatory, unrelated to the geographical implementation of the solution. This includes compliance with the EU AI Act in regard to risk categories; cBrain will not provide any AI solutions within the prohibited use case category.

### 3.2.2 Responsibility

The responsibility for ensuring ethical and compliant AI-solutions are divided into the areas covered by the AI development and the AI implementation. As AI developer, cBrain ensures that all AI solutions follow the technical security and data ethical standards as outlined below and controlled as part of the ISO27001 certification process.

Other requirements are the responsibility of the customer or the hosting operator, where the role of cBrain is to be aware and knowledgeable of the relevant requirements and to advise and guide the customer in screening the use case and the suggested technical solution for any issues regarding delivering responsible, compliant and ethical AI solutions.

cBrain cannot control how the customers orchestrate their organisational implementation, but all cBrain employees are required to highlight any known organisational risk areas in an AI implementation to the customer.

cBrain also offers implementation support ranging from AI literacy courses for customer end users to technical compliance workshops to ensure the customers understand the solution and can take informed responsibility of any relevant risk areas.

### 3.2.3 Documentation and transparency

Compliance should always be documented as part of the product development or implementation project. In Denmark, compliance is documented by following the guidelines and templates from Datatilsynet, e.g. by filling out the impact assessment template (Danish: Konsekvensanalyse). See an example for the F2 AI Assistant here: DPIA for F2 AI Assistant (f2p://dossier/22356249)

AI solutions follow the same guidelines as all other technical solutions in cBrain, requiring technical documentation. For AI solutions, technical documentation should include details on chosen models, algorithms, data sources, and methodologies used when relevant.

## 3.3 Security and privacy

cBrain customers are part of the critical infrastructure and handle very sensitive information. All cBrain solutions are therefore designed, developed and deployed based on the concept of security-by-design. The security measurements are documented in cBrain security policiy and are audited yearly as part of cBrains ISO27001 certification.

### 3.3.1 Data sovereignty

For AI specific this means that all our solutions are offered as an on-premises solutions but can be deployed in cloud environments if the customer prefers it.

By giving the on-premises option, then we can ensure that all data is secure while being processed by AI. No data is stored outside the customers environment.

The customer owns the data and cBrain does not train on customer data or use it for purposes other than the required task.

See cBrains policy and processes regarding data ethics in general.

### 3.3.2 Privacy by design

Whenever cBrain develop or deploy a solution, then we map the data needed in order to support the task at hand. We do not use or save more data than needed.

For training specific AI solutions that require customer data, then we anonymise data when necessary. This is done both to ensure privacy but also to mitigate bias based on personal data.

cBrain do not share sensitive or personal information with third parties unless the customer explicit request us to.

# 4 AI-Specific Considerations

When cBrain engage in an AI projects, the responsible project manager will initiate a screening of the use case and the proposed AI solution. The screening should happen as part of the internal start up meeting for the project and will be documented on the project case with a resume of any identified issues and mitigative actions decided.

This screening should be revisited during the project, if the scope of the use case or the proposed solution change significantly throughout the project.

It is also the responsibility of the project manager to provide technical documentation to the customer regarding the proposed AI solution, so they can make their own risk assessment.

Documentation for the internal screening and the technical documentation sent to the customer should be archived both on the project case in F2, but also linked on this record: ISAE AI control - Documentation (f2p://dossier/26059259) for a quick overview of documentation for our ISAE controls regarding responsible AI.

The areas which should be reviewed in the screening are the AI-specific considerations listed below in this chapter.

## 4.1 Transparency and Explainability

- To support accountability for AI-supported decisions, solutions are designed for transparency.
- Build AI solutions modularly, separating data, process, and AI to ensure transparency.
- The decision-maker should be presented with a full overview of what the AI output is based on and should be able to trace any decision back to:
    1. The data foundation available at the time.
    2. The business logic, organizational responsibility, and specific decision process.
    3. The AI output.

Transparency is further supported by the logging in F2 for full audit trail for document editing.

## 4.2 Accountability

- Designing for the public sector requires a high focus on accountability for any decision-making, including during the design of AI systems.
- By default, all AI support should be argumentative to the existing process while maintaining human-in-the-loop for all decisions.

## 4.3 Audit Trail

- As a case management system for public sector decision support, F2 document the following areas for all cases:
    1. What was the data at the time?
    2. What was the process logic?
    3. What was the AI output?
    4. What was the human decision?

## 4.4 Monitoring and Continuous Improvement

To ensure AI solutions remain reliable and aligned with evolving standards, continuous monitoring and improvement are required.

- **Model Updates:** Regularly evaluate whether newer and more capable open-source models become available, and plan for a controlled switch where such models improve performance, security, or compliance.
- **Retraining:** For machine learning systems trained on organizational data, establish a process for periodic retraining to ensure outputs reflect the most recent and relevant information.
- **Performance Monitoring:** Monitor AI accuracy, fairness, and efficiency, with clear criteria for when updates or retraining should be initiated.

## 4.5 Bias and Fairness

- Actively identify and mitigate biases in data and algorithms to ensure fair treatment of all users. Is related to cBrains existing data ethic policies.

## 4.6 Environmental Impact

- Consider the environmental impact of AI systems, including energy consumption and carbon footprint.
- This is mainly relevant in the choice of Large Language Models (LLMs). Do not use the biggest model available when smaller, more specialized models can do the job.

# 5 Organisation

The responsibility for ensuring that cBrain follow the AI policy lies with the Head of Product Management, Frejdie Søndergaard-Gudmandsen. In order to ensure this, then all initiated AI project should be screened by Product Management in order to ensure that the project group understand and complies with the policy.

## 5.1 AI literacy

AI literacy is the subject of the EU AI Act, Article 4, but it's also the foundation for the responsible employees working with AI projects to be able to understand AI on a deeper level than just as an end user and thereby being able to spot risk areas in the implementation or usage of AI within cBrain and at the customers organisation.

All relevant cBrain employees are required to receive training in AI literary, offered through cUni (cUni - Course: AI Literacy (f2p://dossier/23661237))