

Our Code of Conduct for Artificial Intelligence



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1. Introduction and Purpose

As the European and an international leader in Learning and Development, the Cegos Group is both a keen observer and a dedicated player in the world of work and business. **Our mission goes beyond the simple economic framework: we train individuals and support organisations to meet their development challenges.**

Faced with the far-reaching changes that are shaking up our societies, the promise we make to our customers (contractors or learners) is more relevant than ever. **We are committed to turning skills into performance.** Cegos thus advises and supports companies in their plans to transform and grow, stimulating the personal and professional development of individuals worldwide. Accordingly, all the solutions we offer (ready to go training, tailor-made solutions, blended and digital learning, outsourcing and much more) are designed to deliver a unique learning experience and to turn skills into performance.

As an L&D Full Service Provider, we support our customers throughout the entire training value chain (design, implementation, administration), always keeping in mind the need to boost their performance.

As a leading and reliable expert, we offer reliability and security to our customers. In direct contact with companies and their developments, our solutions are pragmatic and results oriented. This approach allows us to measure together the impact of training and optimize the Learning & Development investment.

At the forefront of innovation, we use innovation to enhance experience: to support changes in society, the economy and jobs; to engage the learner over time through personalized pathways; to make digital & blended learning a driver of performance.

As an international partner, our worldwide network as well as our global and multilingual solutions allows us to work with a portfolio of major international customers.

Three values are at the heart of our business culture:

Commitment: We work passionately and uncompromisingly to empower our customers. We work responsibly and transparently to nurture trust.

Agility: We are relentlessly curious and open-minded to innovate. We listen and adjust to each situation to provide the right solution.

Sharing: we work respectfully and trustingly to foster teamwork. We are supportive and generous to openly share all our knowledge and skills.

AI Systems in the Cegos Group

Since several years, the Cegos Group started testing and exploring different applications of AI (i.e. any machine -based system that can, for a given set of human defined objectives, make predictions, recommendations or decisions influencing real or virtual environments), in its business, and organizing workgroups to reflect on AI's impact on the way we work and deliver our services to our clients.

The purpose of the AI Code of Conduct

This document serves as a foundational guideline to ensure ethical, transparent, and responsible use of artificial intelligence technologies within our organisation, training offer, solutions and services.

We outline the Cegos Group commitment to fairness, accountability, privacy, and the safety of any use of AI solutions, emphasizing the protection of our stakeholders' data and ensuring that AI-driven solutions do not perpetuate biases or inequalities.

The importance of ethics in AI usage.

A leader in Learning & Development, the Cegos Group has always been fully committed to the ethical application of technology in personal and organizational development. The same applies to the use of AI systems.

This code of conduct applies to all Cegos Group entities. As such, it is communicated to all Group teams.

With this code of conduct we provide a clear framework for decision-making and behaviour for employees, ensuring that all AI-powered initiatives are aligned with the organization's values and are used to augment and enhance the learning experience in a manner that is both innovative and ethically sound.

2. Governance and Leadership

Roles and responsibilities for AI ethical governance.

Our governance model emphasizes a top-down approach to ethical AI management, where strategic directions guide tactical planning and operational execution.

Regular communication and reporting mechanisms ensure alignment, accountability, and responsiveness to emerging AI challenges and opportunities.

The Cegos group implemented the following governance model which is designed to ensure clarity in roles, responsibilities, and processes for oversight and decision-making.

Level	Composition	Responsibilities	Frequency of meetings
AI Advisory Board Strategic level	- Members of the Executive Board - Director for Group Solutions & Partners - Corporate Communication Director - IT Director Cegos SA - IT security Director, Cegos SA - Head of legal department Cegos SA	Define the overarching strategy, objectives, and ethical guidelines for AI usage. Approve policies, review performance against strategic goals, and ensure compliance with legal and ethical standards.	2 per year or as needed for strategic decisions.
AI Ethics and Compliance Referents Tactical Level	- Corporate Editorial Manager (head of group and reference for AI points of contact in entities) - DPO - Head of e-services - HR Director, Cegos SA - Head of Legal Department, Cegos SA - Marketing Director, Cegos SA - Cegos Group Head of Communication / Cegos Group Communication Director	This group acts as a referent to handle questions relating to the use of AI within the Group, in compliance with this code of conduct. It acts as a bridge between strategic oversight and operational execution.	Quarterly or as required to review ongoing AI projects and ethical considerations.
Operational Teams Operational Level	Teams in charge of concrete operational projects that integrate AI.	Execute AI projects in line with established guidelines, report any ethical or compliance issues to the AI Ethics and Compliance Referents, and implement corrective actions as directed.	AI will be a topic in the team's project meetings to ensure continuous alignment with governance guidelines and ethical standards.

Cross-Functional Coordination

Inside the Cegos Group ticketing system (<https://support.cegossdigitalstudio.com/>) a specific account allows to receive any question from the operational teams, related to the compliance and guidelines described in this code of conduct. Our Corporate Editorial Manager is responsible for collecting, answering or bringing the topics to be discussed by the AI Ethics and Compliance Referents.

3. Core Ethical Principles

Here are our 7 core ethical principles, applied in our different activities, from communication to learning design and deployment.

Transparency inside and out: Explain how and why AI systems make decisions.

We strive for transparency in design, development, and deployment processes of any AI system and will always indicate when the learner, or any of our clients, is interacting with an AI agent or system. We will have a clear communication about how AI is used in learning environments and the basis on which it makes recommendations or decisions. If and when using AI systems or agents, we will offer explainability, allowing users to understand the reasoning behind AI decisions.

Accountability: Define who is responsible for AI decisions and outcomes.

The Cegos “**AI Advisory Board**” (IAAB) has the ultimate responsibility for the actions and decisions made by AI systems, but each Managing Director has the 1st level of responsibility in applying this code of conduct in their local systems.

Our content producers (Marketing, communication, content and training development) are trained to have a critical thinking approach to any interaction with AI systems and stay on the pilot seat.

In case any team members, Cegos Group client or learner raise ethical concerns or report violations of our code of conduct, this topic will be discussed and decided in the IAAB group, to review and rectify AI-driven decisions, safeguarding against harm or bias.

Privacy and Data Protection: Detail how user data is protected and used.

The Cegos Group is compliant with the European Union legislation regarding data privacy and security.

Cegos content producers are committed not to use confidential data in their prompting, like sensitive or personal data.

Cegos content developers are committed not to use sources which may not be free of copyright, and which are not explicitly mentioned, in contravention of intellectual property law, to protect copyrights.

As part of its commitment to data security and compliance with its customer requirements, the Cegos Group prohibits the use of open-source artificial intelligence (e.g., ChatGPT public licenses) to process, analyze, or interact with confidential or personal data identifying a customer, partner, or individual. We apply this rule to all non-public information, whether contractual, strategic, commercial, or personal, including project names, employee identities, specific training content, documents shared by customers, or items subject to confidentiality clauses.

Safety and Reliability

With our “General Information Security Policy”, we aim to also guarantee the safety and security of our systems, ensuring they operate reliably and do not pose any harm to users. This includes implementing robust security measures to protect against unauthorized access and misuse of technologies and data.

AI to Enhance

We focus on using AI for the greater good, and to ensuring that its deployment in L&D contributes beneficially to the development of our customers & learners. AI should be used to enhance learning experiences, support personalized learning paths, and improve educational outcomes.

We integrate AI tools to streamline workflows, allowing people to focus on higher-level strategic tasks, and develop their expertise.

We monitor the market for tools that may enhance our productivity and quality and offer ongoing training to keep our key people aware of the latest AI advancements and guide them on applying AI ethically and effectively.

Fairness, equity and non-discrimination

Cegos employees who are concerned with the use of AI are not to take AI words at face value and always apply a peer-review system for any AI produced content.

We will actively train and work to reduce and eliminate biases in AI training data and algorithms and to ensure AI systems do not reinforce societal biases or perpetrate unfair discrimination.

We regularly review and audit the application of our “editorial guidelines” in the design and development of our training offer.

Sustainability

We consider the environmental impact of AI development and deployment, prioritizing sustainable and eco-friendly practices. We consider the environmental footprint of AI systems and encourage our teams to give preference to energy-efficient solutions.

4. Content development and Design Guidelines

Guidelines for ethical AI design and development of our group offer

We have defined editorial guidelines which are regularly updated, and which must apply to all teams involved in the design and development of our group offer.

5. Deployment and use inside our learning systems

The Cegos Group currently uses AI to design and develop its training offer and solutions. In doing so and when we use AI-based systems to interact with users and learners, we apply the principles of the currently in force European Regulation on Artificial Intelligence (AI Act), particularly with regard to transparency, human oversight, data quality, and risk management.

We also ensure compliance with the contractual framework and specific requirements set by our clients, particularly in sensitive sectors or those subject to specific regulatory constraints.

Ongoing monitoring and maintenance of AI systems

Monitoring: each Cegos entity monitors their AI systems to assess their performance, compliance with ethical standards, and adherence to regulatory requirements. Each Managing Director signs an agreement which commits them to respect and enforce the compliance of AI systems at the level of his entity.

Reporting and Tracking: We use our reporting tool, ticketlab (<https://support.cegosedigitalstudio.com/>) to collect any feedback regarding accuracy, bias, and fairness of our offer.

Feedback Loops: Inside our systems we share our contacts to allow end-users to report issues or concerns with AI systems. This feedback should be reviewed regularly by the operational teams and escalated to the members from the AI Ethics and Compliance Group.

We review and update AI governance policies and guidelines as needed to reflect the learnings from incidents and ensure better prevention and handling in the future.

6. Stakeholder Engagement and Communication

This code of conduct as well as the rules and principles it covers are:

- Shared with all employees and new recruits within the Group. As such, it is integrated into the online CSR training process which is mandatory and offered to each new employee (See 7.)
- Shared with partners who deliver Cegos Group training to our customers.
- Available and downloadable online on the Cegos Group website (<https://www.egos.com/en/responsibility>) and on the websites of the Group's entities.

7. Training and Awareness

Promote awareness of the AI Code of Conduct within the organization

All the Cegos employees will have a mandatory training in CSR, that includes a specific topic regarding AI awareness, Code of Conduct, and showing how AI ethical use is everyone's responsibility.

We implement a communication plan to promote the AI Code of Conduct across the organization.

In our group newsletter, we include regular updates on AI ethics topics, sharing news articles and research findings.

Establish training programs according to specific roles

Depending on our employees' role and responsibilities, we implement specific training to ensure the optimal application of these guiding principles by teams using AI in their work.

8. Review and Monitoring

Review and Updating of the AI Code of Conduct

The AI Code of Conduct will be reviewed by the **AI Advisory Board**, in their bi-annual meetings, to ensure it reflects the latest ethical standards, technological advancements, and regulatory requirements.

During the process, they incorporate all the feedback from the tactical, operational teams, and may consult external advisory experts to ensure it reflects the latest trends and standards.

Changes might involve clarifying language, addressing new ethical considerations, or updating compliance obligations.

Updates are communicated to all stakeholders, incorporated into the AI code of conduct when needed and in the Cegos training program, ensuring everyone is aware of the changes.

9. Conclusion

This code of conduct is not just a set of guidelines, but reflects our dedication to integrity, fairness, and respect in all our technological endeavours. It's a manifestation of our core values and mission, embodying our commitment to harness the transformative power of AI responsibly and ethically.

This commitment ensures that we adhere to standards of ethical conduct and foster an environment of trust and transparency with our stakeholders.

By embedding these principles into our organizational fabric, we aim to lead by example in the ethical use of AI, ensuring that our innovations contribute positively to a society where technology amplifies human potential without compromising ethical integrity.

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