



Responsible AI Policy

B:HIVE Building, Smales Farm, 74 Taharoto Road, Auckland 0622, New Zealand

WWW.FUEL50.COM | ENGAGE@FUEL50.COM | +64 9 356 9758

Table of Contents

I. Purpose and Scope..... 3

II. Fuel50 RAI Principles 3

III. AI Objectives and Strategy..... 4

IV. AI Governance and Responsibility..... 6

V. AI Risk Management..... 9

VI. Workforce Management..... 12

VII Regulatory Compliance 12

VIII. Review and Enforcement of the AI Policy 13

Version Control..... 13

Related Policies 14

Introduction to the AI Policy

As artificial intelligence (AI) unlocks opportunities for businesses to increase efficiency and generate novel insights and offerings. Fuel50 seeks to build responsible AI practices that align with ethical principles, mitigate potential risks, and foster trust with stakeholders.

This is an organizational-level policy, designed to be a foundational document to establish guiding principles, objectives, and management direction for all AI-related activities according to business requirements.

This standalone policy for AI also centralizes and highlights our responsible AI strategy to accelerate internal adoption and external awareness.

Developing an AI Policy is a requirement of an AI management system under leading standard ISO/IEC 42001.

This policy establishes a comprehensive framework for Fuel50's development, procurement, supply, and use of AI technologies. It provides one interpretation of how global and regional guidance, including the [NIST AI Risk Management Framework \(RMF\)](#), [ISO/IEC 42001](#) and OWASP Top 10 for LLMs can be operationalized through corporate policy, informed by RAI Institute's deep expertise in accelerating our maturity for AI.

I. Purpose and Scope

- At Fuel50, we recognize the transformative potential of artificial intelligence (AI) to enhance our operations, products, and services. This Policy outlines our commitment to responsible AI development, deployment, and the internal use to ensure ethical considerations are upheld, AI risks are managed, and compliance to emerging regulation is achieved.
- The AI Policy provides a framework to guide all activities at Fuel50 related to AI. This Policy applies to all employees, and contractors involved in the development, procurement, and use of AI within Fuel50.
- This policy applies to AI in all its forms including bespoke applications and solutions, or where it is embedded in software-as-a-service platforms and services, or pilot AI projects, or those deployed in production.
- We **define AI**¹ as 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.
 - We **define an AI model** as a component of an information system that implements AI technology and uses computational, statistical, or machine-learning techniques to produce outputs from a given set of inputs. AI models can be broad and versatile.
 - We **define an AI system/tool** as any software, hardware, application, tool, or utility that operates in whole or in part using AI. AI Systems are often limited to a particular task. This includes Fuel50 custom-made AI solutions in our products.
 - We have developed these definitions in alignment with leading industry and ecosystems definitions, including the EU AI Act, ISO_IEC_22989_2022 to define the bounds of AI life cycle management and inventorying and of compliance requirements, as appropriate for our context and use cases.

II. Fuel50 RAI Principles

- In alignment with the established Fuel50 enterprise values, we are committed to upholding ethical principles in the AI activities e.g., procurement, development and internal use of AI technologies.
- Our AI principles encompass the following²:
 - **Data Privacy and Security:** All AI systems shall safeguard human autonomy, identity, and dignity with respect to privacy fully.
 - **Accountability:** We embrace a clear AI ownership in our Governance model and AI policies.
 - **Transparency:** All AI systems are designed and documented to answer how and why a decision was made by the system. Every recommendation is traceable to specific algorithmic rules with decision traceability.

¹ Aligned with ISO/IEC 22989:2022

² Aligned with ISO/IEC 42001 B.6.1.2.

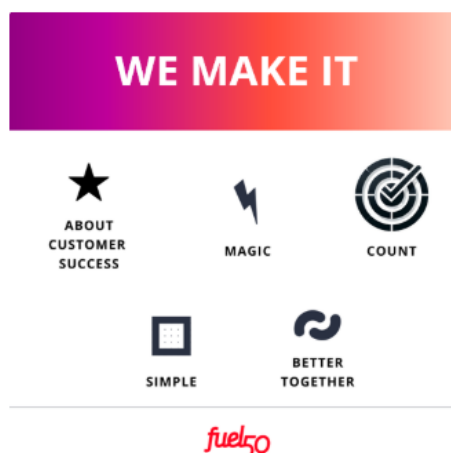
- **Fairness by Design:** Our AI algorithms do not consume demographic data. We are transparent about the use and capabilities of our AI systems.
- **Bias Prevention:** Every recommendation is traceable to specific algorithmic rules with decision traceability. Our systems are compliant with anti-bias legislation including NYC regulations, with successful third-party bias audits and publicly available results.
- **Human Centric:** We commit to ensuring that all processes and materials related to AI in our organization are subject to proper oversight mechanisms to enable responsible development and internal use of AI.



III. AI Objectives and Strategy

- Fuel50 is a talent intelligence platform that addresses critical business challenges. Leveraging AI is a critical part of our product and business operations strategy, delivering productivity, product differentiation and client value.
- However, we also foresee challenges to responsible procurement, development and/or internal use of AI, given the context of our organization and of our use cases. This includes regulatory requirements, and industry-specific data challenges.
- With these potential benefits and challenges in mind, a long-term AI business strategy is underway, with ongoing development, documentation and implementation. The **key objectives** that shall guide this strategy are as follows:
 - **Building trust and brand reputation:** Fuel50 strive to build trust with stakeholders and bolster brand reputation by demonstrating transparent and responsible AI practices.
 - **Mitigating risks:** Proactive engagement with AI frameworks and utilizing a risk-based approach, helps mitigate potential legal, reputational, and financial risks associated with irresponsible AI use, protecting both the organization and individuals.
 - **Fostering responsible innovation:** By adhering to best practices, maintaining transparency, accountability, and establishing strong governance structures, Fuel50 can foster a culture of responsible and safe AI innovation, ensuring its positive impact on society alongside its development.

- The AI objectives shall align with Fuel50's broader values shown below.



- Recognizing the need for bespoke, flexible, and unobtrusive organizational adaptation for AI, the contents of this AI Policy shall be used as an augmenting layer on top of Fuel50's existing governance, policies, and processes as defined in IMS.³
- While Fuel50's AI objectives will continue to mature over time, the pace of AI adoption and associated risk has led Fuel50 to prioritise the following as near-term focus areas within our AI strategy:
 - **For bought systems:**
 - a) To procure AI responsibly, Fuel50 will:
 - (1) Apply a principles-driven procurement process that sufficiently weighs marketplace options and comprehensively assesses the risks attached to potential suppliers and their product or service;
 - (2) Apply legal means to clarify liability and other requirements with suppliers, to whatever extent is not articulated by regulation (for example DPA or other required amendment);
 - (3) Role- and system-specific training and educational materials for employees such that procured AI can be used safely and responsibly.
 - **For built systems:**
 - a) Responsibly building AI requires Fuel50 to apply appropriate controls and capabilities in the following areas:
 - (1) A governance framework that balances innovation with the necessary governance gates and other processes, such as AI Impact Assessments, to sufficiently manage risks;
 - (2) Processes to enable systematic and comprehensive documentation of AI systems throughout their life cycle, in accordance with regulatory requirements;
 - (3) Responsible AI training for all technical and nontechnical roles involved in an AI system's life cycle across design, development, deployment, and operation.
 - **For sold systems:**

³ Fuel50 Integrated Management System (IMS) <https://fuel50.atlassian.net/wiki/x/jYCrfw>

- a) Responsibly selling AI requires Fuel50 to apply appropriate controls and capabilities in the following areas:
 - (1) Regular assessment of downstream impacts of AI products, enabled by transparency and shared learning agreements with buyers while also protecting users' privacy and other rights; and
 - (2) Strong Privacy controls.
- Fuel50 maintains a commitment to continually improve the suitability, adequacy, and effectiveness of this AI Policy.⁴

IV. AI Governance and Responsibility

- Accountability for AI governance across Fuel50 should be assigned to the appropriate role, along with ownership of the identified AI risks, and documented in relevant decision logs.
- The following executive or senior management positions are designated as the champions of Fuel50's responsible AI panel. The Executive Sponsor is responsible for ensuring that Fuel50's responsible AI strategy is developed and executed effectively and is ultimately accountable for its success.
 - The CPO is the AI Executive Sponsor, responsible for:
 - a) leading product strategy, ensuring that AI initiatives and technological developments align with business objectives and this AI policy;
 - b) overseeing the strategic implementation and management of AI technologies within the Fuel50, this is to ensure ethical AI practices;
 - c) managing life cycle progression and impact of AI systems;
 - d) ensuring that the use of data in AI systems is transparent, accountable, and respects individual privacy and data protection rights;
 - e) providing executive oversight of AI-related risks associated with Fuel50 AI systems;
 - f) leading the AI Exec Steering Committee;
 - g) managing the effective implementation of AI Governance that enable proper AI oversight across the organization.
 - The CFOO oversees business operations. He ensures that Fuel50 adheres to regulatory requirements, manages enterprise risks effectively, and maintains robust governance practices.
 - a) provide executive oversight of AI-related risks within the broader enterprise risk management framework;

⁴ Aligned with ISO/IEC 42001 10.1. An organization's AI management system, in accordance with the scope of ISO/IEC 42001, refers to the collective body of management structures and processes established for an organization to responsibly perform their role with respect to AI systems (e.g. to use, develop, monitor or provide products or services that utilize AI). This AI Policy has been designed as a top-level framework for an organization's AI management system.

- b) ensuring appropriate resourcing, structures, and escalation pathways are in place to address AI-related risks;
 - c) support the AI Governance that enable proper AI oversight across the organization.
- The GSPM is accountable for ensuring that AI systems do not violate legal or regulatory requirements, the GSPM responsible for:
 - a) overseeing adherence to established AI policy guidelines throughout the company;
 - b) ensuring that initiatives involving AI are compliant with applicable legal and regulatory frameworks;
 - c) leading the identification, assessment and mitigation of AI-related legal, regulatory, and privacy risks, in coordination with product and operational teams;
 - d) fostering a culture of responsible AI use within Fuel50 through training, education, and employee engagement;
 - e) leading AI Operational Committee;
 - f) regularly reporting material AI risk findings, themes, and escalations to the CPO and CFOO to support effective executive oversight.
- Fuel50 's responsible AI decision-making framework, and two major **governance bodies**⁵ are illustrated below:

Organizations require structured approaches to AI system approval that align decision-making authority with system risk level and potential business impact. The following approach illustrates how Fuel50 might structure approval workflows while maintaining appropriate oversight and operational efficiency.

- Minimal-risk AI systems with limited potential for harm or business impact may receive approval through GPSM with committee notification to maintain awareness while avoiding unnecessary administrative burden. These systems typically include internal process optimization tools, basic automation applications, and analytical systems with limited stakeholder impact.
- Limited-risk systems with moderate potential for impact require committee review and approval to ensure appropriate risk assessment and mitigation measures. These systems often include customer-facing applications with human oversight, decision-support tools, and systems that process personal information within established privacy frameworks.
- High-risk systems with significant potential for harm or business impact require comprehensive committee approval and executive endorsement to ensure appropriate senior leadership engagement and accountability. These systems typically include autonomous decision-making applications, systems affecting fundamental rights, and applications with significant regulatory or reputational implications.

⁵ ISO/IEC 42001 3.22 notes that “not all organizations, particularly small organizations, will have a governing body separate from top management.” The creation of separate steering and operational groups may not be necessary.

- An **AI Exec Steering Committee** shall provide executive leadership and oversight, including direction, mandates, and resourcing for responsible AI efforts, in a timely manner. The Steering Committee has representation across senior-level management, including the whole leadership team: President, CFOO, CPO and CDDO.
- An **Operational AI Steering Committee** shall direct the implementation, life cycle progression and impact of AI systems, and act as a convening power for responsible AI efforts. The Operational Committee has representation across functions and/or divisions of Fuel50, including: Head of Engineering, Senior Engineer Manager, GSPM; and Support Lead.
- The Operational AI Committee shall convene as required by GSPM, and the full committee will meet at least every six months. Its responsibilities include:
 - approving onboarding of an AI product;
 - directing the development and updating of both cross-functional and function-specific AI guidance and tools alongside function or division leaders;
 - developing and managing AI-related inventories, such as of AI systems and AI incidents;
 - determining and implementing changes to the AI management system in a planned manner; and
 - any required escalation to Exec Steering Committee.
- The Exec Steering Committee shall convene at least once a year. Its responsibilities include:
 - developing an organizational-level AI strategy with a clear timeline and measures of success (KPIs);
 - determining and re-assessing organizational AI risk tolerances;
 - determining and allocating the resources needed for the establishment, implementation, maintenance, and continual improvement of the AI products;
 - aligning workforce planning with responsible AI human capital needs.
- **Stakeholder Management and Communication channels** shall be augmented to enable proper information sharing and issue management between different AI actors. These channels shall facilitate various processes percolating upwards or downwards Fuel50's structure, including:
 - A mechanism for employees or contractors to ask question or report their concerns about any of Fuel50's AI activities or with respect to an AI system throughout its life cycle.
 - Readily accessible means for Fuel50 employees and contractors to read and understand organisation wider AI-related material and guidance.
- **Governance gates** shall be established to facilitate the standardized approval of AI systems' life cycle progression and the collection of documentation at each life cycle stage. Governance gates shall accomplish the following:
 - Be performed and managed by GSPM and the Operational Committee with high-level oversight by the Steering Committee through triggers and mechanisms for escalation of decisions.

- Pause or terminate an AI proof of concept (PoC) or project once a risk has been identified that measures beyond Fuel50's risk tolerance (see [Risk Management](#) in Fuel50 IMS); Approval requirements are tied to continued alignment with organizational RAI principles and objectives, determined via established measures.
- Utilize AI Impact Assessments as a tool to inform approval decisions and set conditions for progression.
- **For bought systems:**
 - All AI procurement process should comply to Fuel50 internal AI policy. [Risk Evaluation Form](#) should be completed before any new onboarding. AI vendors are required to complete the attached AI vendor assessment questionnaire.
 - Project teams shall request information on all data used to develop the system from the supplier. Based on the data documentation requirements, suppliers of systems shall be required to disclose data types and features, sources, consent policy, privacy policy, collection and quality assessment, disposal policy to advance in the procurement process.
 - Project teams shall clarify and establish data control and sharing requirements with the supplier, including what data received or created by the system will be shared with the supplier, what Fuel50 data will be visible to the supplier, what data related or resulting from use of the system will be retained by the supplier and/or used to train the system. What data related or resulting from use of the system will be controlled by Fuel50.
 - Project teams shall document post-deployment and/or post-decommission data protocols to manage data generated through the operation of the system, including e.g., input and output logs, event and incident logs, and shall document details on how such data is collected, utilized, stored, and/or disposed.
- **For sold systems:**
 - In partnership with compliance, legal, and sales teams, project teams shall determine and compile data documentation that is relevant, required, or requested by buyers of systems.
 - In partnership with compliance, legal, and sales teams, project teams shall clarify and establish data control and sharing requirements with the buyer, including what data received or created by the system will be shared with Fuel50, what buyer data will be visible to Fuel50, what data related or resulting from use of the model will be retained by Fuel50 and/or used to train the system, what data related or resulting from use of the model will be controlled by the buyer.

V.AI Risk Management

- A comprehensive AI risk assessment framework has been implemented by IMS. The following guidance shall be incorporated into the existing Fuel50 risk management framework.

Some applicable risk taxonomies for AI initiatives include:

- **Data Risks:** Risks related to the quality, integrity, privacy, and security of data used in AI systems.

- **Model Risks:** Risks associated with the development, validation, and deployment of AI models, including bias, fairness, accuracy, and interpretability.
- **Operational Risks:** Risks arising from the day-to-day operation of AI systems, such as performance degradation, system failures, and inadequate monitoring.
- **Ethical Risks:** Risks related to AI's ethical implications, including unintended consequences, societal impacts, and potential harm to individuals or groups.
- **Regulatory Risks:** Risks stemming from non-compliance with laws, regulations, and industry standards governing AI usage, data protection, and privacy.
- **Legal Risks:** Risks associated with potential legal liabilities, lawsuits, and disputes arising from AI-related activities, including intellectual property infringement and contractual obligations.
- **Reputational Risks:** Risks to Fuel50's reputation and brand image resulting from negative publicity, public backlash, or loss of trust due to AI-related incidents or controversies.
- **Strategic Risks:** Risks related to aligning AI initiatives with organizational objectives, long-term strategy, and stakeholder expectations.
- **Financial Risks:** Risks associated with the financial implications of AI projects, including budget overruns, cost uncertainties, and failure to realize expected returns on investment.
- **Supply Chain Risks:** Risks arising from dependencies on third-party vendors, suppliers, or service providers involved in the development, deployment, or maintenance of AI systems.
- AI threats may also be identified using recognised external sources, such as the OWASP top 10 for LLMs.
- Fuel50 **defines an AI risk impact as** a negative effect experienced by the organization, individuals, groups of individuals, societies as a result of the organization's development, use, or otherwise interaction with AI technologies.
- At Fuel50, we recognize that tolerating risk is necessary to pursue innovation and remain competitive. As we balance the opportunities of AI with its risks, we define the following boundaries of Fuel50's **risk tolerance** with respect to AI:
 - Use cases that carry unacceptable risks are prohibited without condition. Unacceptable risks are aligned with leading and emerging requirements, such as the EU AI Act.
 - Based on our own values and risk appetite, we additionally prohibit systems that introduce the following unacceptable risks: e.g., unfair and unexplainable promotion or termination decisions for employees based on an automated decision; exposure of client personal information.
 - The following **risk thresholds** apply to all systems immediately prior to deployment:
 - a) Systems that remain very high-risk or high-risk post-treatment shall not be allowed to deploy.
 - b) Systems deemed moderate-risk post-treatment shall be subject to more rigorous and frequent testing and monitoring requirements, including impact assessments, than those deemed minimal-risk.
- Components of Fuel50's risk management process for AI systems are as follows:
 - Impact Identification with AI Impact Assessments
 - Risk Measurement

CONFIDENTIAL

- Risk Prioritization
- Risk Treatment
- Residual Risk
- Impact and Risk Tracking, Inventorying, and Transparency
- Impact Contingency Planning and Resource
- Impact Reassessment
- AI Impact Assessments: Fuel50's **AI Impact Assessment** and **AI Impact Threshold Assessment** identifies potential impacts of an AI system through a snapshot evaluation of current and anticipated system development, deployment, and operation.
 - The AI Impact Assessment is meant to guide teams to expand their impact considerations, improve their responsible AI practices throughout the system life cycle, and determine next steps for risk treatment, the impact assessment can be used at different points in a system's life cycle at varying levels of specificity based on system maturity.
 - a) An **AI Impact Threshold Assessment** is completed prior to the implementation stage with the use of a Microsoft form.
 - b) An **AI Impact Assessment** is completed immediately after the **AI Impact Threshold Assessment** with the appropriate stakeholders (or Operational Committee), if medium – high risk is identified.
 - The AI Impact Assessment shall:
 - a) Produce consistent, valid and comparable results across different systems and levels of specificity;
 - b) Assess the system according to trustworthiness characteristics, including validity and reliability; safety; security and resiliency; accountability and transparency; explainability and interpretability; privacy-enhanced; fairness with harmful bias managed;
 - c) Calibrate its assessment criteria based on various aspects of the system and its specific technical and societal context, including expected scope of use, the data used for the development of the AI system, the AI technologies used, the third-party components or services used, and use case context.
 - d) Be documented, have its results retained for a defined period, and be made available to all relevant and impacted audiences.
 - e) Risk Measurement: Once potential impacts are identified through the AI Impact Assessment and assigned with a severity score, AI risk is calculated through a likelihood analysis. Likelihood and magnitude of each identified impact are determined in a standardized manner through Fuel50 risk management.
- Risk Prioritization: The order of prioritization for AI system risk treatment shall be mainly automated using metrics as follows:
 - Highest net opportunity-to-treatment cost ratio
 - Estimated risk residual level is within deployment threshold (minimal or moderate risk)

- Highest net opportunity/benefit-to-risk residual and monitoring cost ratio
- Absolute highest opportunity/benefit measure
- Absolute lowest risk residual level
- Risk Treatment: Risk treatment of a system shall consist of an appropriate and justified response to each identified risk and a system-level estimate of the resources needed to complete all risk responses collectively.
- Impact and Risk Tracking, Inventorying, and Transparency: Materialized impacts from deployed systems shall be documented in an internal inventory and shall be broadly and publicly reported.
- Fuel50 defines an AI incident as “an event, circumstance or series of events where the development, use or malfunctions of one or more AI systems directly or indirectly leads to specific harms (to people, property, or other crucial interests)” This definition is developed to align with our definition and taxonomy for AI impacts, and therefore [e.g. “does not make a distinction between ‘incidents’, ‘accidents’, ‘hazards’, and ‘near-misses’ nor limits ‘incidents’ to only unexpected events, unlike in other disciplines”]
- We follow existing Incident Management Process and Procedures to report and manage AI incidents.

VI. Workforce Management

- The following guidance shall be incorporated into the existing workforce management framework wherever absent.
 - Diversity, Equity, and Inclusion (DEI) is and will inform every component of Fuel50’s AI strategy.
 - Employee Awareness and Competence: Employees and relevant contractor and partners of Fuel50 shall receive responsible AI training to enable them to understand and perform their duties with respect to the AI management system outlined in this Policy and to other related policies and processes.
 - Employees shall demonstrate adherence to responsible use policies and processes, including only using approved systems (to avoid “shadow AI” risks) and only using systems as intended by system documentation.

VII. Regulatory Compliance

- Compliance with existing data, analytics, and technology regulation at Fuel50 is implemented by IMS. The following guidance for compliance for AI systems shall be incorporated into existing compliance activities wherever absent.
- The GSPM shall actively monitor and understand all existing and emerging legal and regulatory requirements relevant to all AI activities.
- The GSPM shall map the compliance requirements of AI system, to support technical teams to determine requirements at each stage of a system’s life cycle.
- The GSPM shall receive appropriate foundational legal and AI training to enable successful implementation of compliance organization wide.

CONFIDENTIAL

- The GSPM shall develop role- or system-specific compliance training and other guidance materials for the workforce, with the support of function leadership or system owners, respectively.

VIII. Review and Enforcement of the AI Policy

- GSPM shall maintain this Policy and is responsible for **monitoring** and **reviewing** the effectiveness of the Policy and of the AI management system described therein every year, with ongoing input from cross-functional stakeholders and periodic review by executive committee.
- The AI Operational Committee shall be responsible for procedures to **detect** and **respond to deviations and violations** of the Policy.

Version Control

Date	Version	Person	Description of change
01 July 2025	0.1	@GSPM	Initial document template created
16 Feb 2026	1	@GSPM	First version, approved by president, CPO, CFOO and GPSM

Related Policies

Policy Document	Link
External AI Policy	
Internal AI Policy	5.7 AI (Artificial Intelligence) Usage Policy - Information Security & Privacy Management System - Confluence
Fuel50 AI Principles	Fuel50 Responsible AI - Information Security & Privacy Management System - Confluence
AI Risk Management Register	Internal Operations - Docs - AI Risk Mgmt - All Documents
Fuel50 AI vendor Risk Assessment Tool	Fuel50 AI Vendor Risk Assessment Tool - Information Security & Privacy Management System - Confluence
AI service/model factsheet	Template: New AI Service/Model Factsheet - Engineering - Confluence List of Unique AI Features [Draft] - Engineering - Confluence
Resource Requirement	[Template] AI system Resource Requirement - Engineering - Confluence
AI impact assessment	[Template] AI system Impact Assessment - Engineering - Confluence
AI inventory	List of Unique AI Features [Draft] - Engineering - Confluence
AI lifecycle Policy	AI System Lifecycle Policy - Engineering - Confluence