

AI Policy



Artificial Intelligence Policy
Climater Group

Artificial intelligence is significantly reshaping the way we work and live. It is changing how we perform our roles, strengthening our ways of working, and opening up new opportunities.

For organizations, AI is a powerful driver of innovation and growth. At Climater, we choose to embrace this opportunity and move forward with confidence. At the same time, the use of AI raises **important challenges**, including security, transparency, protection of personal data, and accountability.

To address these challenges, **Climater has established a dedicated AI policy** that defines best practices for responsible, secure, and ethical use of artificial intelligence. This policy complements our core values and existing internal policies.

We ask all Climater employees to **embrace these best practices** and apply them in their day-to-day work. Together, let us make AI a tool that benefits everyone, in line with our commitments and our values.



At Climater, people remain at the center of our decisions, our values, and our business model. AI is a tool that supports our work. It is never a replacement for human judgment.

Governance

Ensure the responsible, ethical use of AI in line with Climater's values, business objectives, and applicable regulations.

Security

Protect the confidentiality, security, and integrity of our data, as well as that of our clients and partners.

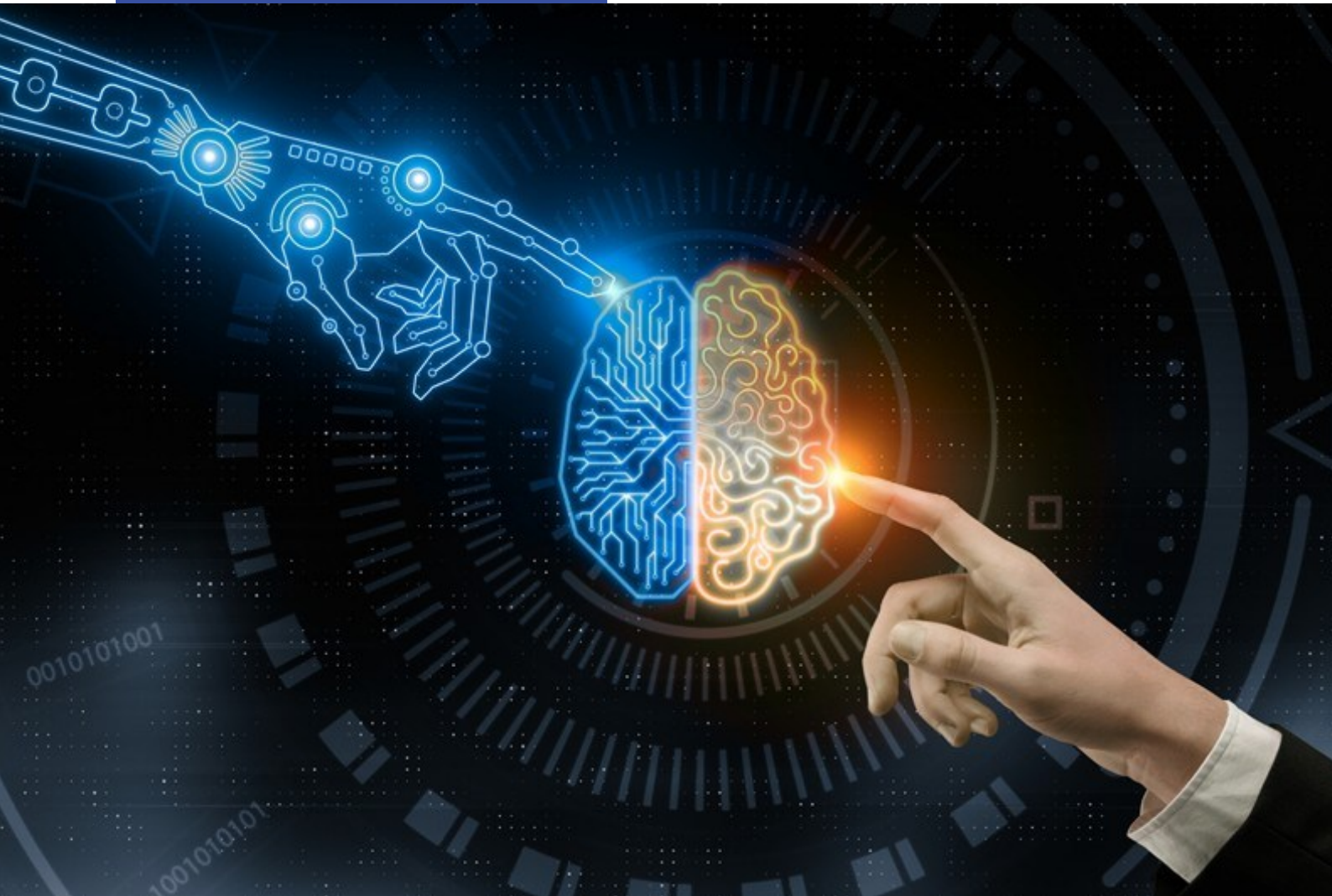
Enablement

Support the development of employee skills and encourage the adoption of AI tools that add value to day-to-day work. Provide transparency on oversight mechanisms and clearly communicate consequences in the event of non-compliance.

Definitions

Artificial intelligence (AI) refers to the ability of computer systems to perform tasks that would normally require human intelligence, such as understanding, learning, reasoning, or creating content. AI relies on algorithms that analyze data to **generate outputs** such as responses, recommendations, or content

Generative AI is a specific category of AI capable of producing original content, such as text, images, or code ; based on **instructions** (or **prompt**) provided by a user



A **prompt** is the instruction or question given to an AI. The clarity and precision of a prompt have a direct impact on the quality and relevance of the results. Writing effective prompts is a skill that continues to evolve. Vague or poorly defined prompts may lead to inaccurate outputs or **hallucinations**

An AI **hallucination** refers to false or fabricated information presented by an AI with a high degree of confidence. In such cases, the system may generate incorrect facts, figures, references, or sources in an attempt to support an output that is ultimately inaccurate

Our Principles

AI as a tool, not a decision-maker

AI is intended to support and accelerate our work, not to replace human judgment. Final decisions must always be made and validated by Climater employees. **The true added value of the Climater Group lies in the people who make it up.** We all remain fully accountable for decisions informed or supported by AI.

AI tools

Only AI tools explicitly approved by Climater's IT Department are authorized for use. This requirement is essential to ensure data security, regulatory compliance, and to limit risks associated with unapproved or uncontrolled third-party solutions.

The IT Department supports subsidiaries in the design and deployment of AI solutions to ensure data protection, security, and compliance standards are met.

Environment and equipment

All interactions with AI tools must be carried out exclusively using company-issued devices and professional accounts. The use of AI tools on personal devices or through personal accounts is strictly prohibited, in order to protect data security and ensure compliance with internal policies.



Ethics & Compliance

Protection of sensitive data

When using an AI approved by Climater, **strict compliance with applicable laws and regulations is mandatory**, including GDPR, Quebec's Act Respecting the Protection of Personal Information in the Private Sector as amended by Law 25, PIPEDA, the EU AI Act, and any other applicable legislation. As a result, it is strictly prohibited to input personal, identifying, or confidential information into an AI. When in doubt, do not submit the data.

Fairness and non-discrimination

Compliance with applicable laws, regulations, and Climater's values is essential. Any use of AI that could result in discrimination or unequal treatment is strictly prohibited.

Environmental responsibility

The use of artificial intelligence has an environmental impact, particularly due to the energy consumption required to train and operate AI systems. An AI request typically consumes significantly more energy than a traditional web search.

For this reason, **a responsible and measured approach is required.** This includes limiting unnecessary use, avoiding repetitive or low-value requests, and formulating clear and precise prompts to reduce unnecessary interactions.



Training

Climater supports all employees through **mandatory training** on the responsible and secure use of artificial intelligence.

Failure to comply with the rules set out in this policy is subject to the provisions of the company's internal code of conduct

Controls & Audits

To ensure data security and compliance with this policy, **Climater implements measures to support and enforce its application.** These measures may include, but are not limited to:

- **Managing access rights** to reduce risks related to sensitive data
- **Blocking unauthorized websites** to prevent the use of unapproved external AI tools
- Conducting **mandatory assessment campaigns**
- Performing **regular audits** of local AI usage, including verification of compliance with internal policies, access traceability, and analysis of incidents or potential misuse

These controls are continuously reviewed and adjusted to maintain a high level of security and regulatory compliance.

Governance, Support & Reporting

AI governance is overseen by a dedicated group of AI representatives. This group includes members from IT, Human Resources, Legal, and business teams from across the subsidiaries. This cross-functional structure ensures a balanced approach that addresses technical, human, regulatory, and operational considerations.

For any **questions, guidance**, or to report an **incident** or **inappropriate use of AI**, employees may contact the AI representatives at:

- **Anglais** : ai-contact@groupe-climater.com
- **Français** : ia-contact@groupe-climater.com

Marc TROUCHAUD
President, Climater Group

