Responsible AI Principles

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Version: 1.1

Valid from 2025-01-04

Version	Date	Name	Description of changes
1.0	2025-01-04	Claire-Louise Cook	Document/template approved/published

I.Introduction

XTM recognises the potential of artificial intelligence (AI) to transform the way we work and improve the products and services we provide.

We are committed to ensuring we use AI in a secure and responsible way, respecting privacy, confidentiality and third party rights. This includes any AI used by third parties on our behalf.

Like most businesses, we are using ever more sophisticated analytics and technology to deliver our products and services. These Principles set out our approach to using AI in the course of our business.

Generally, we use the term 'artificial intelligence' to describe machine-based systems which infer solutions to set tasks and have a degree of autonomy. The scope of these Principles, however, is broader than AI and includes any machine-driven insights resulting from the use of systems and techniques within the field of data science.

We already have robust policies and processes in place that are applicable to AI. The purpose of our Responsible AI Principles is to complement these.

II.AI guiding principles

As part of our responsible AI approach, we:

A.   consider the real-world impact of any AI that we may use or develop;

B.   take action to prevent the creation of reinforcement of unfair bias;

C.   can explain how we try and influence the AI we use;

D.   create accountability through human oversight; and

E.   respect privacy and champion robust data governance.

AI is a field that evolves continually, at unprecedented speed and scale. These Principles will develop over time, based on internal and external feedback as well as industry and legislative trends.

III.Considering the real-world impact of any AI that we develop or use

When developing or using AI, we seek to identify the range of people who may benefit or be impacted and how.

We identify stakeholders beyond direct customers or employees and think about whether people's health, livelihood (including career prospects) or rights are affected in any way.

This level of consideration enables us to use trustworthy AI tools and systems in line with our company values.

IV. Preventing the creation or reinforcement of unfair bias -Responsibility

Promoting fairness and non-discrimination is at the core of our business philosophy and values.

We understand that mathematical, statistical or data accuracy does not guarantee freedom from bias, which is why we act to prevent the creation or reinforcement of unfair bias.

When such actions are not taken, bias can be introduced inadvertently via data inputs and/or through machine processing or algorithms. This bias can then be perpetuated as the AI system operates and develops.

V. Explaining how AI works - Transparency

At XTM, we strive to keep our customers informed about the decision-making processes related to our AI tools, providing them with full transparency through policies, terms and conditions, and in-product notifications.

We also evaluate an AI system's reliability and are explicit about its intended use.

VI. Accountability

XTM AI governance is rooted in AI principles, emphasising the development of technology that is accountable and privacy-conscious.

We only use AI tools and systems subject to an agreed set of terms and conditions, as well as applicable law and we hold our suppliers accountable to these requirements.

This supports ongoing, robust quality assurance of the output of any AI.

VII. Respecting privacy and championing robust data governance

Protecting the privacy rights of individuals is core to the successful deployment of AI and to our long-term success as a business.

As we discover new ways of using AI, we recognise that strong data governance is essential. AI systems function more accurately when they are fed large amounts of high-quality data and some data sets are utilised across solutions for multiple purposes. We ensure we have robust data management and security policies and procedures.

To ensure proper ongoing control and compliance with the requirements, XTM has appointed a cross-business team responsible for ongoing control and implementation of good practices in the field of AI.

Some datasets include personal data. We are committed to handling personal data in accordance with all applicable data protection laws and regulations as well as our own privacy policy, which requires that we always act as responsible stewards of personal data.
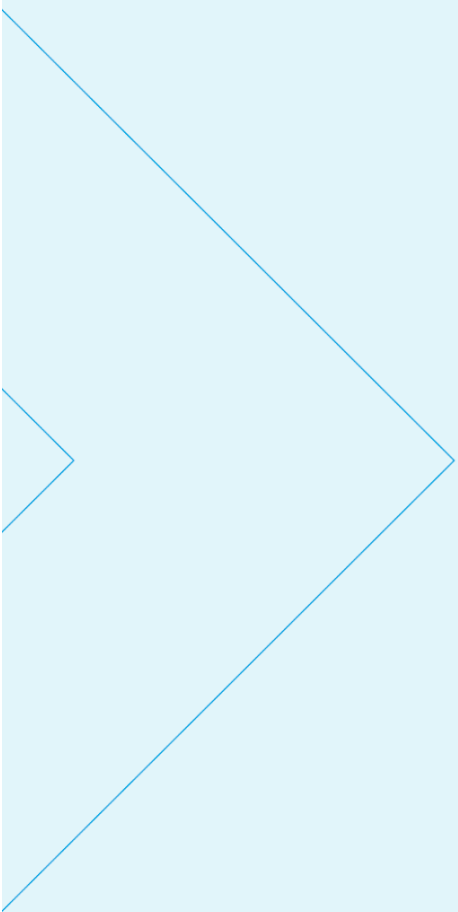
At the outset of any AI project, we will identify whether personal data may be involved. If so, we will:

A. adopt a data protection by design and default approach;

B. ensure we have a lawful ground for processing personal data using AI;

C. consider whether a data protection impact assessment is necessary;

D. provide transparent information about the processing to affected individuals;

E. take steps to mitigate security risks and limit unnecessary processing;

F. ensure we can comply with data subject rights and requests including, where relevant, in relation to automated decision-making; and

G. require the same privacy standards of any third parties we share data with or that process personal data on our behalf.

VIII.Further information

If you require any further information, or you have concerns regarding our use of AI, please contact us via the following methods:

legal@xtm-intl.com