

GROUP POLICY - ACCEPTABLE USE OF AI





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1 DOCUMENT INFORMATION

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Reviewer	Group CIO
Approver	COO

2 SCOPE OF THE DOCUMENT

This policy aims to promote the careful, informed, and responsible adoption of Artificial Intelligence (AI) technologies within the organization. It sets out guidelines to ensure AI adoption is controlled, ethical, and aligned with organizational goals, with clear roles and responsibilities for governance.

3 APPLICABILITY

This policy applies to all employees, contractors, partners, and third-party vendors involved in the development, deployment, or use of AI systems within the organization.

4 DEFINITIONS AND ACRONYMS

Scorpio: means Scorpio Holdings Limited, Moxie Corp., Gorgon Holdings Limited, Scorpio Tankers Inc., and all their respective direct and indirect subsidiaries and other affiliates.

Information Resources: means Scorpio information and related resources, such as equipment, devices, software and other information technology.

IT Resources: means Internet/Intranet/Extranet-related devices, systems and services,

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including but not limited to computer equipment, software, operating systems, storage media, file transfer services, network accounts, account, mailboxes (collectively referred to as “IT resources”).

AI: stands for Artificial Intelligence. Is a technology framework that enables computers and machines to simulate human learning, comprehension, problem solving, decision making, creativity and autonomy.

SaaS: is a cloud-based software delivery model where users access applications over the internet, typically through a subscription. Instead of installing and maintaining software on individual devices, users access it via a web browser, while the provider handles infrastructure, maintenance, and updates.

Generative AI: refers to artificial intelligence systems that can create new content—such as text, images, music, or code, by learning patterns from existing data. These models generate outputs that resemble human-created content, often using techniques like deep learning and neural networks.

Machine Learning: is a branch of artificial intelligence that enables systems to learn from data and improve their performance over time without being explicitly programmed. It uses algorithms to identify patterns and make predictions or decisions based on input data.

Impersonation: The act of pretending to be another person, whether through voice, appearance, or digital representation, typically to deceive or mislead others about one’s identity.

Deepfake: Artificially generated or manipulated audio, video, or image content that uses AI to realistically depict a person saying or doing things they did not actually say or do.

Agentic AI: Artificial intelligence systems capable of autonomous goal setting, decision-making, and action, often operating with a degree of independence from direct human oversight.

5 SYSTEMS IN SCOPE

All IT Resources, Services, SaaS, non-SaaS software platforms making use of Generative AI, Agentic AI systems and other Machine learning technologies, and their use for business activities withing companies of the Scorpio Group.

6 POLICY

The adoption of AI technologies @ Scorpio must adhere to the following principles:

1. **Awareness and Caution:** Users must understand the potential benefits and risks of AI technologies, including ethical, privacy, security, and legal implications.
 - a. Use of AI technologies must comply with all applicable laws and regulations, including data protection (e.g., GDPR), privacy, and industry-specific compliance requirements
 - b. The tools that are allowed are responding to specific criteria in terms of cyber-security
 - c. The use of tools that are not explicitly allowed, within the Scorpio Corporate IT framework, is strictly forbidden
 - d. Free or publicly available (e.g., ChatGPT free, Bard, etc.) or contracted AI tools must not be used with company, client, or proprietary data unless explicitly approved by the IT Committee and IT Risk and Compliance team
 - e. Users are responsible to verify upfront that the service or functionality they are seeking are not already available/contracted at the corporate level
 - f. Special considerations must be given to agentic AI systems, ensuring robust oversight, clear boundaries for autonomous actions, and mechanisms for human intervention
 - g. Users must validate and review AI-generated content before applying it to business decisions, communications, or official documentation, to prevent misinformation, bias, or reputational risk
 - h. All output from AI technology remains the responsibility of the user. Errors and omissions are not AI's fault but the users' responsibility
 - i. Any AI-generated images or illustrations shared externally must be clearly identified as such
 - j. If not using Corporate Copilot subscriptions, any Material Non-Public Information (MNPI), personal data, proprietary business information, client data, and intellectual property must not be shared with an unauthorized free of charge or paid AI technology without prior and effective anonymization
 - k. AI tools may not be used to create synthetic audio, video, or images that impersonate real individuals (impersonation and deep fakes) without their explicit written consent. All AI-generated content featuring human likenesses must be clearly identified as synthetic
 - l. The organization will promote AI related trainings to ensure the proper user awareness in full coherence with this AI policy.

2. **Controlled Adoption:** AI systems deployment and use must be overseen and approved by the Scorpio IT Department to ensure consistency, security, compliance and scalability
 - a. The use of AI Technologies is encouraged when striving to improve team productivity, execution accuracy, efficiency and effectiveness
 - b. Each AI implementation is initially classified as "proof of concept" (POC), subject to the AI Committee and IT approval for diffused and permanent adoption
 - c. Use of AI technologies must be acknowledged by the HoD, and the purchase of any chargeable AI service is subject to the "Purchasing of IT Services" policy and must be approved
 - d. All approved AI tools must be subject to periodic monitoring and audit by IT Risk and Compliance, and/or Internal Audit to ensure ongoing adherence to security, compliance, and business standards
 - e. Assignment of charged AI subscriptions to employees and / or development of AI related initiatives will be properly controlled and approved to maximise the return of investment



- f. the AI Committee and IT Risk & Compliance team are responsible for reviewing and approving agentic AI deployments, and for establishing escalation protocols for unexpected autonomous behaviours
 - g. Procurement of external AI solutions must include contractual safeguards around data ownership, portability, and exit strategies to prevent vendor lock-in.
3. **Accountability:** Clear roles and responsibilities are established for AI governance within the organization:
- a. AI restricted team, composed by
 - i. COO,
 - ii. AI Group Subject Matter Expert,
 - iii. Group CIO,
 - iv. Geoserve CTO,
 - v. Group Head of IT Innovation and Growth,
 - vi. Group Head of IT Risk & Compliance that acts as the IT point of contact for all IT related matters
 - b. Head of Departments (HoDs) that are expected to assess, validate and propose the AI service adoptions / the AI charged subscriptions assignment
 - c. AI Ambassadors that are key reference point, appointed by the respective HoDs, representing their department in proposing AI solution adoptions and supporting the diffusion of AI practices

If any employee or contractor is in doubt about sharing information with AI technologies or has questions regarding this policy, they are urged to contact the Data Protection department (dataprotection@scorpiogroup.net) for guidance.

7 POLICY COMPLIANCE

7.1 COMPLIANCE MEASUREMENT

The IT Risk & Compliance team will verify compliance to this policy through various methods, including but not limited to, periodic walkthroughs, business tool reports, internal and external audits, and feedback to the policy owner.

7.2 NON-COMPLIANCE

Any behavior not aligned with this policy consists in a material breach of the **Group policy - Codes of Ethics** and will be subject to the **Group policy - Disciplinary**.

8 LINKED DOCUMENTS

This document makes references to documentation that can be found on [Scorpio Intranet](#):

- Group policy - Anti-discrimination, anti-harassment, and no workplace violence
- Group policy - Data Protection
- Group policy - Acceptable Use of IT Services
- Group policy - Purchasing of IT Services