

Data and Artificial Intelligence Governance Policy

Objectives

This Policy establishes the principles and requirements for the governance of data and the development, acquisition, use, monitoring, and retirement of Artificial Intelligence (AI) across Advanced Info Service Public Company Limited and its subsidiaries (collectively referred to as the “Company”). The Company intends to ensure that data and AI are governed and used in an effective, secure, transparent, accountable, and auditable manner, supporting the Company’s business objectives while creating value from data, protecting the rights of stakeholders, and ensuring compliance with applicable laws, regulations, standards, and ethical principles.

Scope

This Policy applies to the governance of data and Artificial Intelligence (AI) across the Company. It covers the management of Company data throughout the AI lifecycle, including the design, acquisition, development, testing, deployment, monitoring, improvement, and retirement of AI systems. The Policy also applies, where relevant, to data obtained from business partners, third parties, and publicly available data. All employees and personnel acting on behalf of the Company who access or process data, or who are involved in the development or use of AI, shall comply with this Policy and any other applicable Company policies, standards, or guidelines. The Company shall ensure that AI is developed and used in a responsible, transparent, secure, and accountable manner, in compliance with applicable laws, regulations, standards, and ethical principles.

Data and AI Governance

The Company defines roles, duties, and responsibilities in accordance with the **Three Lines of Defense Principle**. The **Management Committee (MC)** sets the objectives and strategic direction for data governance and the responsible use of AI, ensuring alignment with the Group’s strategy, applicable laws and regulations, and relevant international standards.

- **First Line of Defense:** Data Owners, AI system owners, and Data Users are responsible for the management of data and Artificial Intelligence (AI), including the identification, assessment, and management of operational risks associated with data and AI.
- **Second Line of Defense:** Risk Management, Compliance, and Data and AI Governance functions are responsible for establishing frameworks, policies, standards, and oversight mechanisms for data and AI risks, and for monitoring compliance with applicable laws, regulations, and related requirements.
- **Third Line of Defense:** Independent assurance functions are responsible for reviewing and assessing operations and risk management activities to ensure compliance with applicable laws, regulations, policies, and standards related to data and AI governance.

The Company has established a **Data & AI Governance Working Group** to drive, oversee, and support data and AI governance in alignment with the Company's direction, policies, and standards. The **Working Group** also reviews and evaluates key data and AI matters for escalation to the **Management Committee (MC)** or other designated committees, while promoting the responsible use of data and AI across the organization.

Responsible AI Principle

The Company has established AI governance in accordance with the **Responsible AI Principle**, which consists of the following seven key elements:

- **Fairness** - The Company shall ensure that AI systems are developed and used in a fair manner, minimizing the risks of bias and inappropriate discrimination. The Company shall promote the assessment and mitigation of bias in data, AI models, and AI-generated outcomes, as appropriate, to ensure that stakeholders receive equitable benefits and that AI is used in accordance with its intended purpose.
- **Human Agency and Oversight** - The Company shall ensure that AI systems operate under an appropriate level of human oversight. Human involvement shall be maintained in the supervision, review, decision-making, or control of AI systems where the use of AI may have a significant impact on individuals, business operations, or stakeholders. This is to ensure that AI is used responsibly, in alignment with the Company's values, while promoting fundamental values and respecting human rights.
- **Privacy and Security** - The Company shall ensure the protection of personal data and the security of information throughout the AI lifecycle. Appropriate controls and security measures shall be implemented in accordance with applicable laws, regulations, standards, and Company policies to prevent unauthorized access, use, processing, disclosure, modification, deletion, or destruction of data.
- **Safety and Robustness** - The Company shall ensure that AI systems are secure, reliable, and fit for purpose. AI systems shall be designed, tested, assessed, monitored, and subject to risk management activities throughout the AI lifecycle to identify, prevent, and mitigate potential risks and adverse impacts on the Company, users, business operations, and stakeholders.
- **Transparency and Explainability** - The Company shall ensure that AI systems are developed and used in a transparent manner. The processes, decisions, and outcomes of AI systems shall be explainable to a level appropriate to the nature and risk profile of the AI system. The Company shall promote the provision of relevant information regarding the use of AI to users and stakeholders to enhance understanding, build trust and confidence, and support appropriate oversight and review of AI systems. In line with this principle, where appropriate, the Company shall provide clear and meaningful information when individuals interact with AI systems or where AI may materially influence decisions or outcomes affecting them.

- **Accountability** - The Company shall establish clear roles, responsibilities, and accountability for Data Owners, AI system owners, AI developers, AI users, and other relevant stakeholders. Appropriate monitoring and oversight mechanisms shall be implemented to ensure that the development and use of AI comply with applicable laws, regulations, standards, and Company policies, and remain subject to appropriate governance and review.
- **Environmental Impact** - The Company shall ensure that the development and use of AI consider the efficient use of resources and minimize environmental impacts throughout the AI lifecycle, supporting sustainable operations and long-term growth.

AI Risk Identification and Assessment

The Company has established a mechanism for the identification, assessment, monitoring, and management of risks associated with the development, acquisition, and use of Artificial Intelligence (AI) throughout the AI lifecycle. Data Owners or AI system owners shall be responsible for assessing and managing such risks to ensure that they remain within a level acceptable to the Company. Based on the assessed level of risk, the Company applies governance, oversight, and control measures proportionate to the nature, purpose, complexity, and potential impact of AI systems.

Data Governance

The Company recognizes data as a critical organizational asset and shall ensure that data is managed throughout the AI lifecycle. Data management shall consider data quality, security, and governance requirements, including Accuracy, Completeness, Availability, Confidentiality, Integrity, and Traceability. Data Owners and other relevant data management roles shall be assigned, as appropriate, to ensure effective governance and accountability for data under their responsibility. The Company shall establish requirements for data classification, access rights management, data sharing, data retention, and data disposal in accordance with applicable laws, regulations, and Company policies.

Third Party Management

The Company shall establish requirements for the selection, assessment, and oversight of third parties involved in the development, acquisition, provision, or use of Artificial Intelligence (AI). Appropriate due diligence and risk assessments shall be conducted in accordance with the Company's policies, standards, and requirements prior to engagement. The Company shall also perform ongoing monitoring and review, as appropriate, to ensure that third parties comply with applicable laws, security standards, personal data protection requirements, intellectual property rights obligations, and the Company's requirements throughout the AI lifecycle.

Artificial Intelligence Lifecycle Governance

The Company shall establish governance over the entire AI lifecycle, including solution design, data preparation, model development, deployment, monitoring of AI utilization, performance evaluation, and retirement of AI systems. Such governance shall be conducted in accordance with the Responsible AI Principles, as well as applicable laws, regulations, standards, and relevant Company policies, to ensure the responsible, secure, transparent, and accountable development and use of Artificial Intelligence (AI).

Responsible Use of Data for AI

The Company shall ensure that data used for the development, training, testing, and deployment of Artificial Intelligence (AI) is used appropriately, securely, and in compliance with applicable laws and regulations. Such data shall be governed with consideration for data quality, traceability, protection of sensitive and personal data, and the implementation of appropriate information security measures throughout the AI lifecycle.

Where personal data is used for the development, training, testing, or deployment of AI systems, the Company shall implement appropriate data protection measures based on the nature of the data, the level of processing risk, and the potential impact on data subjects. Such measures shall ensure compliance with applicable personal data protection laws and other relevant legal and regulatory requirements.

Responsible Use of Generative AI

The Company shall ensure that the use of Generative Artificial Intelligence (Generative AI) is for legitimate business purposes and is conducted in accordance with the Company's policies, standards, and Responsible AI Principles. Such use shall take into consideration personal data protection, confidentiality of business information, information security, and intellectual property rights. The Company prohibits the use of Confidential information, personal data, customer data, or other sensitive Company information in Generative AI systems that have not been approved by the Company. Outputs generated by Generative AI shall be subject to appropriate human review and oversight prior to use, publication, or communication to external parties. Such review shall verify the accuracy, appropriateness, and compliance of the output with applicable laws, regulations, standards, and Company policies.

Intellectual Property and AI

The Company recognizes the importance of protecting intellectual property rights and shall respect the intellectual property rights of both the Company and third parties. Any use, reproduction, modification, adaptation, or other utilization of copyrighted or otherwise protected materials shall be conducted on an appropriate lawful basis and in compliance with applicable laws, regulations, and Company requirements. The use of Artificial Intelligence (AI) shall not infringe upon the intellectual property rights of any third party. Prior to use, any output generated by AI shall be reviewed and validated to ensure its accuracy, appropriateness, and compliance with applicable intellectual property rights, laws, regulations, standards, and Company policies. Any work product, content, deliverable, or output created in the course of employment or performance of duties on behalf of the Company, including those developed with the use of Artificial Intelligence (AI), shall be considered the property of the Company and shall be used only in accordance with the Company's business objectives, policies, standards, and applicable requirements.

AI Literacy and Capability Development

The Company shall promote the continuous development of AI literacy, awareness, and competencies for employees and personnel acting on behalf of the Company, taking into account their respective roles and responsibilities. This enables the responsible, secure, and ethical development, use, and governance of Artificial Intelligence (AI) in compliance with applicable laws, regulations, internationally recognized standards, and the Company's policies and requirements. The Company also fosters innovation and sustainable value creation through the responsible adoption of AI.

Monitoring and Compliance

The Company shall regularly monitor, assess, and review compliance with this Policy, including the management of data and the development, use, and governance of Artificial Intelligence (AI). Appropriate corrective actions and preventive measures shall be implemented to address risks, deficiencies, or instances of non-compliance, and to support the continuous improvement of data and AI governance practices. The Company shall ensure that its data and AI governance framework remains effective and aligned with evolving business requirements, technological developments, applicable laws, regulations, standards, and other relevant requirements.

Policy Review

The Company shall review this Policy, as appropriate, and revise it whenever necessary to ensure its continued alignment with the Company's business context, technological developments, applicable laws, regulations, relevant requirements, and internationally recognized best practices.

Applicable Standards and References

The Company's AI governance approach is informed by internationally recognized standards, frameworks, and industry best practices, including, but not limited to:

- **Electronic Transactions Development Agency (ETDA), Thailand:** AI Governance Guideline.
- **National Institute of Standards and Technology (NIST):** AI Risk Management Framework (AI RMF 1.0).
- **ISO/IEC 23894:2023:** Artificial Intelligence - Risk Management.
- **ISO/IEC 42001:2023:** Artificial Intelligence Management System (AIMS).
- **GSM Association (GSMA):** The AI Ethics Playbook: Implementing Ethical Principles into Everyday Business (2022).
- **Organisation for Economic Co-operation and Development (OECD):** Recommendation of the Council on Artificial Intelligence (OECD AI Principles).



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