

ARTIFICIAL INTELLIGENCE POLICY

The design and development of Artificial Intelligence systems aimed at their ethical and transparent use is of strategic importance for REFORMER to achieve its short-term and long-term goals.

For this reason, REFORMER ensures adherence to best practices, governance frameworks, national or European legislative requirements, and ethical standards, as well as compliance with the requirements of the Artificial Intelligence Systems Governance Framework, based on the ISO 42001 standard.

REFORMER, recognizing the criticality of developing artificial intelligence systems that respect fundamental human rights, data privacy, fairness, and transparency, implements an Artificial Intelligence Policy aimed at:

- Ensuring compliance with relevant laws, regulations, and standards.
- Monitoring artificial intelligence systems for bias, errors, and potential risks.
- Ensuring the confidentiality, integrity, and availability of information managed by the artificial intelligence system.
- Ensuring the proper functioning of the artificial intelligence information systems.
- Prompt handling of incidents that may jeopardize the proper functioning of artificial intelligence systems.

For this purpose:

- Organizational structures necessary for monitoring issues related to Artificial Intelligence are defined.
- It is ensured that artificial intelligence systems do not introduce bias based on race, gender, religion, or other protected characteristics.
- Critical artificial intelligence decisions, such as those affecting human rights or financial outcomes, are subject to human oversight by the relevant organizational structures of the Company.
- Data used to train artificial intelligence systems are collected, stored, and processed in accordance with data protection regulations (e.g., GDPR).
- All artificial intelligence systems comply with organizational Cybersecurity protocols to protect against unauthorized access, data breaches, or adversarial attacks.
- Artificial intelligence systems are designed with ethical considerations built in from the outset.
- For each artificial intelligence project, risk assessments and classification/categorization of the artificial intelligence system are carried out as defined by Regulation 2024/1689 (AI Act), and the relevant requirements per risk category are applied.
- Artificial intelligence algorithms are rigorously tested for bias, performance, and ethical standards.
- Rigorous testing, integration, and user acceptance methodologies are used to validate artificial intelligence systems.
- Artificial intelligence systems are monitored in real time to identify errors, risks, or performance issues.

- A relevant risk assessment framework is applied, and an Impact Assessment Study has been conducted.
- An incident management procedure resulting from the use of artificial intelligence systems has been developed.
- Regular training is provided to employees and interested parties regarding the responsible use of artificial intelligence, compliance with the ISO 42001 standard, and data protection.
- The management of artificial intelligence systems is monitored regularly with the aim of continuous improvement.

REFORMER conducts risk assessments related to artificial intelligence at regular intervals and takes necessary measures to address them. It implements a framework for evaluating the effectiveness of AI system management procedures, through which performance indicators are determined, their measurement methodology is described, and periodic reports are produced and reviewed by Management for the continuous improvement of the system.

The Artificial Intelligence Systems Coordinator is responsible for auditing and monitoring policies and procedures related to the Systems and taking the necessary initiatives to eliminate all those factors that can jeopardize the proper operation of the Company's artificial intelligence systems. All REFORMER employees and its partners with access to artificial intelligence systems bear the responsibility of complying with the rules of the implemented Policy.

REFORMER is committed to the uninterrupted monitoring and observance of the regulatory and legislative framework and to the continuous implementation and improvement of the effectiveness of the Artificial Intelligence Systems Management System.

For the Management

Antonis Billiris

Chief Executive Officer