



## Responsible Artificial Intelligence at Línea Directa

This document presents and explains the **ethical principles** followed by Línea Directa Aseguradora and the companies in its Group (“Línea Directa”) when using Artificial Intelligence (“AI”). It also describes the **internal allocation of responsibilities** for responsible AI.

The principles and values for the ethical use of AI at Línea Directa, together with the AI Governance Policy that defines the governance framework in this area, have been **approved by the Company’s Board of Directors**.

### 1. Ethical principles and values for Artificial Intelligence

#### 1.1 Ethical principles of Responsible AI

- **Transparency and explainability:** AI systems must be understandable and explainable, so their decisions can be assessed. Clear information must be provided about the use and purpose of AI. Data and models must be documented, and traceability and auditability must be ensured.
- **Equality:** AI systems must avoid all forms of discrimination and bias. They must be designed using representative and legitimate data, ensuring equal treatment and respect for human rights.
- **Confidentiality and privacy:** AI must respect privacy and comply with data protection regulations. Only the personal data needed for the intended purpose may be used, and its security and confidentiality must be protected.
- **Security:** AI systems must include technical and organizational measures that protect them against risks, unauthorized access and vulnerabilities throughout their life cycle.
- **Accountability and human oversight:** The use of AI does not remove human responsibility. Controls must be documented, effective human oversight must be in place, and responsibilities must be clearly defined, including those related to external providers.
- **Social impact:** AI must create benefits for people and society, without negatively affecting human rights or replacing human beings.
- **Proportionality:** The use of AI must be suitable and proportionate to the intended purpose. Its necessity and legitimacy must be assessed in advance.



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- **Awareness and training:** People with responsibilities related to AI must receive appropriate training. All employees must understand the legal and ethical limits that apply to AI.
- **Robustness:** AI systems must be technically sound, resilient to errors and attacks, and able to operate reliably and consistently, especially when they are classified as high-risk systems.

### 1.2 Values of Responsible AI

- All AI systems used by Línea Directa must be:
- **Fair:** promoting equitable and inclusive treatment and avoiding discrimination.
- **Clear:** producing results that are accessible, interpretable and explainable.
- **Responsible:** based on clear objectives and an assessment of the expected impact.
- **Approachable:** designed to foster trust and confidence in the use of AI.
- **Human-centered:** respectful of human rights and designed to support people.
- **Sustainable:** using technology efficiently and with respect for the environment.

### 2. Allocation of responsibilities for Responsible AI

**2.1 RAI Officer:** The AI Officer (“RAI Officer”) ensures regulatory compliance and oversees adherence to ethical principles in the use of AI. The RAI Officer also maintains and supervises the inventory of AI systems and assesses and, where necessary, mitigates related risks.

**2.2 RAI Working Group:** The RAI Working Group is led by the RAI Officer and includes technical, legal, risk and business experts. It supports the ethical and responsible management of AI in line with applicable rules and principles.

**2.3 Integration into internal committees:** The RAI function participates in other governance bodies to ensure a cross-functional approach to responsible AI. These bodies include the Permanent Risk Committee, where the ethical and regulatory perspective is integrated into AI risk management, and the Project Prioritization Committee, where AI projects are aligned with RAI principles and potential risks are identified.

### 3. Artificial Intelligence Governance Procedure

In addition to the Policy and Ethical Principles, the RAI Group has developed an AI Governance Procedure. This procedure sets out the framework that Línea Directa must follow throughout the life cycle of AI systems, from identification and, where applicable, design through to deployment and continuous monitoring.



The procedure is organized into the following main phases, with the RAI Working Group becoming progressively involved as needed:

1. Identify the initiative and determine whether it qualifies as an AI system under the European AI Regulation.
2. Carry out a quick pre-assessment to rule out prohibited uses or unacceptable-risk uses.
3. Conduct a preliminary assessment of the purpose, context, risk level under the Regulation, Línea Directa's role in the value chain, and the applicable regulatory, ethical and mitigation requirements.
4. Complete the RAI Assessment before deployment, validating compliance with ethical principles, technical controls, documentation, security, privacy, transparency and, where applicable, the specific requirements for high-risk systems.
5. Deploy, inventory and continuously monitor the AI system, including periodic monitoring of performance and ethical, legal and security risks, and reassess the system when significant changes occur, where applicable.

The AI governance framework is also supported by **training and awareness initiatives on responsible AI** for employees involved at different levels in the design, development, acquisition or use of AI systems. It also includes **monitoring and control mechanisms based on internal indicators**, which support periodic supervision of these systems.

Together, these principles, policies and procedures reflect the organization's commitment to using Artificial Intelligence in a responsible, supervised and human-centered way.