

Elenia's AI Policy

Our mission

Electrifying
life

Our vision

Responsible reformer of energy
services and markets

Our values

Responsibility for the future | Close to the customer
Open and reliable cooperation | The courage to renew

Our strategic objectives are to earn our customers' trust, operate efficiently, renew the energy markets and services, enable the green transition, mitigate climate change and advance carbon neutrality. Our Code of Conduct and management system promote responsibility and sustainable development in everything we do.

Scope of application

This AI policy applies to all Elenia Group companies. This policy outlines the objectives of our use and monitoring of AI solutions.

Commitments

Principles and commitments of our sustainability management are described in Elenia's Sustainability policy.

Objectives, management and responsibilities

As AI solutions become more common and legislation on the use of AI develops, Elenia Group companies have identified the need to strengthen the principles and conditions for the use of AI in order for Elenia to ensure the safe and responsible use of AI solutions in its own operations. The purpose of this AI policy is to define the main principles, operating methods and responsibilities that are followed in the use of AI solutions in the Elenia Group (hereinafter referred to as "Elenia").

This AI policy is based on Elenia's strategies, assessments and Code of Conduct and confirms Elenia's commitment to implementing the objectives of the EU AI Act (EU 2024/1689). The AI policy applies to all Elenia Group companies and to all Elenia employees and management.

The principles and objectives of the AI policy are supplemented by Elenia Group's guidelines on information security, data protection and information management. The purpose of the AI policy and supplementary guidelines is to ensure that Elenia Group companies comply with the requirements and obligations of AI legislation in their operations, and that compliance with the legislation can be demonstrated by means of appropriate and up-to-date documentation.

Principles for the use and development of AI solutions

Elenia follows the following guiding principles when using and developing AI solutions:

- **Fairness:** Elenia respects and promotes the human rights positivity, fairness and equality of AI solutions in its operations. Elenia ensures that the AI solutions it uses are non-discriminatory and do not cause harm or injustice to customers, employees or other stakeholders.
- **Transparency:** Elenia complies with the principle of AI transparency and provides sufficient and understandable information on the functioning, objectives, monitoring and impacts of AI systems. Elenia takes into account the right of AI system users, customers and other parties to obtain an explanation for decisions that concern or affect them.
- **Reliability:** Elenia ensures the reliability and security of AI solutions and ensures that AI systems function as planned, predictably and without errors and protect the data entered in and received from the AI system. Elenia sees to the appropriate testing and monitoring of AI systems and prevents the misuse of AI systems. Elenia ensures that the grounds of decisions made by AI-based solutions can be verified and errors detected and corrected, if necessary. Elenia ensures adequate training and instructions for persons involved in the development, testing, operation and maintenance of AI systems.
- **Sustainability:** Elenia uses AI solutions responsibly and sustainably, which promotes environmental well-being, benefit to society and economic growth. Elenia takes into account the environmental impacts of the lifecycle of AI systems and aims to minimise their carbon footprint and resource consumption. Elenia supports the ethical values and norms of artificial intelligence and actively participates in the development of ethical and legal regulation of artificial intelligence.
- **Privacy protection:** Elenia respects the protection of the personal data of AI users, customers and other parties and complies with the applicable data protection legislation. Elenia informs AI users, customers and other parties about how their personal data is used in AI systems and undertakes to implement the rights of data subjects also with regard to personal data processed in AI systems.

Prohibited AI solutions

Elenia will not deploy or develop AI solutions for which it cannot be ensured that the aforementioned principles for the use and development of AI are implemented. Elenia also refrains from using prohibited AI solutions referred to in AI regulation. These include:

- AI systems using subliminal techniques (unconscious messages);
- deliberately manipulating or misleading AI systems;
- AI systems that exploit the vulnerabilities of a person or group of persons; and
- AI systems based on social scoring that lead to disadvantageous treatment.

AI literacy

AI literacy refers to the ability to understand AI systems and use them responsibly and safely. Elenia is committed to promoting the AI literacy skills of its personnel and partners, in particular by providing clear instructions for AI users on the use of AI and by arranging regular training.

Monitoring and follow-up

The monitoring of the use of AI solutions is based on the monitoring models described in Elenia's information security policy and data protection policy, where applicable.

Information security and data protection training is mandatory for all Elenia employees and partners using Elenia's information systems. Access rights to information systems can only be granted after the successful completion of introductory training on information security and data protection. We also provide training and instructions for our personnel on the operation of AI systems.

To support the deployment of AI solutions, we have prepared a deployment survey to collect the necessary background information on the use of the planned AI solution in order to assess the risks related to the use of the AI solution and the level of measures used to manage AI solutions.

We report and investigate all incidents related to information security and data protection.

We use internal and external audits to assess the realisation of our partners' information security and data protection levels in order to verify the legality and compliance of operations, identify areas for improvement and monitor partners' information security and data protection levels and the fulfilment of contractual obligations.

We continuously improve our operations and seek new opportunities to develop our processes. Each year, we benchmark our sustainability efforts globally by means of the Global Real Estate Sustainability Benchmark (GRESB) sustainability assessment.

Elenia is Finland's second-largest distribution system operator and the largest customer service provider in the energy sector in Finland. We see to the maintenance and renewal of the electricity network, build electricity networks and connections together with our partner companies, measure our customers' electricity consumption and forward energy data to electricity suppliers. Our service business provides customer service as well as diverse services related to the electricity market for the energy sector and other infrastructure companies.