



AI MANIFESTO - SUTTER

AI in the service of industrial excellence, people and sustainable growth

Vision and commitments for the responsible use of artificial intelligence

Sutter regards artificial intelligence as a driver of responsible innovation, to be used to improve quality, efficiency and service levels, whilst keeping people, customers, data protection and the robustness of its business model at the heart of its operations.

Our vision

For Sutter, AI is an enabling tool: it helps transform data, experience and operational knowledge into more informed decisions, more timely services and more effective processes. Its value depends on the ability to integrate it with expertise, responsibility and a critical mindset.

Commitments to people, customers and stakeholders

- **People-centred approach:** AI supports professional skills and does not replace people, responsibility or human judgement; key decisions remain subject to human control and supervision.
- **Service quality:** AI technologies are designed to improve the accuracy, speed, consistency and quality of our responses to clients, consumers and partners.
- **People development:** Sutter promotes skills, awareness and the responsible use of tools, so that innovation enhances the human contribution and frees up time for higher-value activities.
- **Transparency and trust:** where relevant, Sutter communicates the purposes, benefits, limitations and safeguards of the AI solutions adopted, fostering a clear relationship with customers, partners, communities and institutions.
- **Privacy, security and compliance:** the use of AI is carried out in compliance with regulations, data protection requirements and criteria relating to reliability, security and the verification of outputs.
- **Ethical responsibility:** Sutter is committed to preventing bias, misuse and excessive reliance on these tools, adopting AI only when it generates real value and is consistent with its own values.
- **Shared value and sustainability:** AI can contribute to sustainable growth, the responsible use of resources and constructive dialogue on innovation, for the benefit of the company and the stakeholders with whom it operates.

With this Manifesto, Sutter reaffirms its commitment to safe, transparent and well-governed AI: an ally for innovating responsibly, creating shared value and preserving the trust that underpins relationships with people, customers and communities.

SUTTER'S AI POLICY

WE USE ARTIFICIAL INTELLIGENCE IN A CONSCIENTIOUS, SAFE, AND RESPONSIBLE WAY.

1. NATURE AND FUNCTION OF THE POLICY

This Policy clearly and operationally establishes: what is allowed, what tools to use, with what data, for what use cases, with what permissions, who decides and who controls.

The combination of tools, use cases, and data always determines the correct use of AI.

2. CONTEXT AND POSITIONING

AI has great potential but also risks. For this reason we govern it consciously, according to the principles of Sutter's AI Manifesto.

MANIFESTO AI DI SUTTER

TRANSPARENCY
HUMAN RESPONSIBILITY
STRUCTURED GOVERNMENT
DATA PROTECTION
ATTENTION TO STAKEHOLDERS
CONSCIOUS USE OF RESOURCES

The Policy applies to the entire Group: improper use in a foreign company could generate risks for everyone.

3. PHILOSOPHY OF ADOPTION

We proceed in a progressive and controlled manner.

We evaluate:

- the state of the art of technologies
- the value and potential benefits
- consistency with governance
- the results of the pilot projects

First we test, then we measure, so let's extend.

4. BALANCE BETWEEN INNOVATION AND ETHICS

AI is a tool that empowers people, strengthens skills and creates value.

Technology is at the service of people, never the other way around. We innovate with ethics, responsibility, and respect for corporate values.

5. APPROVED AND PROHIBITED TOOLS

APPROVED

- ✓ Microsoft Copilot (M365)
- ✓ Business tools authorized by the CoE
- ✓ Other tools approved on a case-by-case basis

PROHIBITED

- X Free or personal version chatbots
- X Other tools unauthorized
- X Tools installed without approval

6. WHAT CAN WE DO WITH THE DIFFERENT TOOLS?

WITH COMPANY TOOLS

- Draft and edit texts
- Analyze and summarize documents
- Search internal information
- Create presentations and reports
- Automate tasks repetitive
- Support decisions and analysis

WITH SPECIALIST TOOLS

- Generate code
- Create images and designs
- Translate texts
- Analyze data and trends
- Simulate scenarios and forecasts (if authorized)

We cannot, however: illegal or unethical activities, discriminatory content, privacy violations, automated decisions without human control, use for personal purposes.

7. WHAT DATA WE CAN USE (AND WHERE)

PUBLIC OR NON-SENSITIVE DATA

- We can also use with external tools only if approved
- No personal data
- No confidential data

NON-SENSITIVE INTERNAL COMPANY DATA

- Use only with instruments approved
- Business systems
- Do not share outside

SENSITIVE, CONFIDENTIAL OR SPECIAL DATA

- Forbidden to use with external or public tools
- Use only in certified corporate environments
- Maximum protection and confidentiality

8. THERE IS A POLICY

Sutter's Policy AI establishes what is allowed and what is not allowed, defines tools, use cases, data, roles and responsibility, guarantees safety, ethics and value for the company and people, and it is our reference for every activities with AI.

9. DO YOU HAVE ANY QUESTIONS?

Contact the AI COE! We're here to support you.

- Ask
- Verify
- Share
- Improve together

AI COE: Your one-stop shop for valuable and responsible AI.

10. TOGETHER, LET'S MAKE THE RIGHT CHOICE!

We innovate responsibly. We use AI consciously, safely, and in line with Sutter's values.

Sutter AI Policy SHORT

Operational summary of the general principles for the responsible use of Artificial Intelligence

Version	SUTTER-PR-260702-RB05_0100 - 02/07/2026
Reference document	Sutter AI Policy (SUTTER-PR-260702-RB04_0100)
Scope	Internal summary; does not replace the general Policy

This SHORT version summarises the general principles of the Sutter AI Policy. It does not amend or replace the General Policy: for specific criteria, authorised tools, use cases, approval workflows, controls and operational templates, please refer to the full Policy, the AI Portal and the AI Centre of Excellence (AI CoE).

1. General Principles

Sutter adopts AI in a progressive, controlled and measurable manner, as a driver of innovation and continuous improvement. AI must create real value, enhance quality and efficiency, comply with security and regulatory requirements, empower people and remain consistent with the Code of Ethics, sustainability and customer focus.

- **Human oversight.** AI supports work, but does not replace professional judgement, individual responsibility or competent decision-making.
- **Proportionate use.** Each tool must be used only when useful, authorised and consistent with the purpose, data and level of risk of the specific case.
- **Transparency and updates.** Policies, tools and terms of use are living documents: updated versions are made available through official channels.

2. Essential rules for all users

- **Use only authorised tools.** Only tools classified as Level 1 or Level 2 are permitted, and only in accordance with the relevant terms of use. Prohibited or unassessed tools must not be used in a business context.
- **Protect data.** Internal, confidential, personal, customer/supplier or proprietary company data may only be processed if the tool and the use case permit it. Tools with restricted use require public, generic, summarised or effectively anonymised content.
- **Do not upload special or sensitive data.** Special categories of personal data as defined in Article 9 of the GDPR and critical information are subject to the restrictions set out in the General Policy.
- **Always verify the outputs.** Results generated by AI may be incomplete, incorrect or out of date: the user remains responsible for verifying them before any internal or external use.
- **Do not use AI as a certified source.** The outputs do not replace official data, approved documents, audit evidence, certified financial/operational sources or professional assessments.
- **Report concerns and incidents.** Errors, non-compliant use, accidental data uploads, suspected AI data breaches or discriminatory results must be reported without delay to the AI CoE.
- **Avoid independent initiatives.** New tools, agents, automated workflows or use cases not covered by existing procedures must be submitted to the AI CoE prior to use or activation.

3. Summary classification of tools

Level	Status	General criterion
Level 1	Approved	May be used in accordance with defined policies and conditions; may include corporate and licensed tools, such as COPILOT
Level 2	Restricted use	For authorised cases and permitted data only; if blocked or not enabled, the tool cannot be used.
Level 3	Prohibited	Not compatible with Sutter's standards for security, privacy, transparency or compliance.
Level 4	Not assessed	Cannot be used until the formal assessment by the AI CoE has been completed.

The up-to-date list of tools, technical authorisations and specific conditions of use are available in the General Policy, on the AI Portal and from the AI CoE.

4. Governance, controls and responsibilities

The AI CoE oversees the classification of tools, the assessment of new use cases, guidelines, training, reporting and updates to the governance framework. IT Security, the DPO/Privacy Officer, Legal, Procurement, HR, business owners and system integrators contribute in accordance with the responsibilities set out in the General Policy.

For the purposes of security, compliance, the prevention of Shadow AI and incident management, Sutter may implement technical logging and monitoring measures regarding the use of AI tools and access to generative AI services from company devices, networks or accounts, in accordance with applicable policies and regulations. Misuse of the AI Policy may result in consequences in accordance with company rules, the applicable contract and the internal disciplinary system.

5. When to contact the AI CoE

- **Before uploading data that is not clearly public or generic to non-company tools.** If the data may be company data, personal data, customer/supplier data, confidential data or proprietary data, its compatibility with the tool and use case must be verified.
- **Before using a new tool or automating a process.** Every new AI tool, agent, integration or workflow requires prior assessment and classification.
- **In the event of doubt, an error or a potential incident.** Suspend the activity, do not proceed independently and activate the official channels.

References: General Sutter AI Policy (SUTTER-PR-260702-RB04_0100), AI Portal and AI CoE. Official AI CoE contact:

xxx