Living Repository of AI Literacy Practices

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Disclaimer

The following document is a **living repository** of AI literacy practices collected via a survey that was shared, for the time being, only with AI Pact pledgers. The list of practices here reported is therefore **non-exhaustive and will be** updated regularly.

The aim of this repository is exclusively to provide examples of ongoing AI literacy practices to **encourage learning and exchange** among providers and deployers of AI systems on AI literacy in light of Article 4* of the AI Act. The practices published so far were selected accordingly and divided alphabetically based on their different level of implementation (fully implemented, partially rolled-out, planned).

Please note that implementing the initiatives included in this repository does NOT automatically grant presumption of compliance with Article 4 of the AI Act. Moreover, please consider also that AI Pact pledges are non-legally binding voluntary declarations of engagement.

This living repository is part of a **broader effort of the EU AI Office to support the implementation of Article 4 of the AI Act**. Please see the AI Pact Events webpage for more information on upcoming webinars.

*Article 4 of the AI Act: *Providers and deployers of AI systems shall take measures to ensure, to their best extent, a sufficient level of AI literacy of their staff and other persons dealing with the operation and use of AI systems on their behalf, taking into account their technical knowledge, experience, education and training and the context the AI systems are to be used in, and considering the persons or groups of persons on whom the AI systems are to be used.*

Contents

I. Fully implemented practices

AI & Partners, B.V.

On the organisation

Name: **AI & Partners, B.V.**

Size: Small (16-49 employees)

Headquarter: The Netherlands

Sector: Technology

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

The Orthrus AI Scanner is a tool designed to help organisations comply with the EU AI Act by identifying and managing AI systems used within their operations. Its primary function is to detect and catalogue all AI systems in use, providing organisations with a comprehensive inventory. This helps eliminate blind spots in complex IT environments and establishes a clear foundation for regulatory compliance.

The AI Scanner automatically classifies AI systems into categories defined by the EU AI Act:

- High-risk AI: Systems with significant implications for safety, fundamental rights, or regulatory compliance.
- Transparency-risk AI: Systems requiring disclosure due to their impact on decision-making or perceptions.
- Minimal-risk AI: Low-impact systems with limited regulatory requirements.
- Prohibited AI: Systems that breach ethical norms or fundamental rights.

By leveraging advanced algorithms, the Scanner evaluates high-risk systems to ensure compliance with requirements such as accuracy, transparency, and oversight. This helps organisations mitigate legal, ethical, and reputational risks associated with AI deployment.

The tool supports a range of industries, including healthcare, finance, and employment, enabling organisations to adopt AI responsibly while upholding safety, fairness, and transparency. It empowers decision-makers to align AI use with regulatory standards, fostering trust and accountability in AI governance.

On the AI literacy approach

Status: Fully implemented

Target group: **Organisation's staff**

The AI Literacy Competency Framework is designed to enhance AI understanding across all levels of the organisation, ensuring staff is equipped to engage with AI technologies responsibly and effectively. The framework addresses diverse roles and technical expertise, tailoring learning initiatives to meet specific needs (see below).

- **Leadership**: the focus is on strategic insights, helping decision-makers understand the opportunities, risks, and ethical considerations of AI adoption.
- **Technical teams:** The framework should allow them to benefit from advanced knowledge of AI system functionality, enabling them to design, develop, and maintain systems in compliance with regulatory requirements.
- **Compliance and legal professionals:** The framework should enable them to gain tools to assess AI risk, uphold regulatory standards, and address ethical considerations in deployment.
- **HR teams:** The goal of the framework in this case is to ensure the team learns to navigate inclusivity and fairness in AI-driven decision-making processes, such as recruitment or performance evaluations. Frontline employees, who interact directly with AI systems, receive foundational training to understand their rights, obligations, and the practical impacts of AI in their roles.

The framework recognises the importance of inclusivity and diversity. It emphasises the use of unbiased datasets, equitable practices, and accessibility for underrepresented groups, including women, ethnic minorities, and people with disabilities.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The AI Literacy Competency Framework is designed to accommodate the varying levels of technical knowledge, experience, and educational backgrounds of our staff. It achieves this by structuring learning initiatives into three dimensions: awareness, skills, and motivation, ensuring tailored approaches that meet the needs of diverse roles and expertise levels.

For non-technical staff, the framework emphasises foundational knowledge, such as understanding AI's basic functions, its practical implications, and ethical considerations. This equips employees with the awareness needed to identify opportunities and risks in AI-driven processes. **For technical teams**, the framework provides advanced training, focusing on topics like algorithm design, risk mitigation strategies, and compliance with regulatory standards, enabling them to ensure safe and effective system deployment.

To align with varying educational levels and professional roles, the framework **employs flexible training methodologies, such as self-paced modules, instructor-led workshops, and scenario-based exercises**. This ensures engagement and accessibility for all participants. Additionally, the framework incorporates real-world examples and sector-specific content to make learning relevant to participants' job contexts.

How does the practice take into account the context in which the AI system(s) is/are used?

The AI Literacy Competency Framework emphasises the importance of aligning AI practices with the specific context in which AI systems are used. It tailors its approach to reflect the unique demands, ethical considerations, and regulatory requirements of different industries, such as healthcare, finance, manufacturing, and education.

Sector-specific adaptation is a core element of the framework, ensuring that AI systems are implemented and used in ways that address relevant risks, societal impacts, and operational challenges. For example, in healthcare, the focus may include patient safety, data privacy, and bias mitigation in diagnostics, while in finance, the emphasis might be on transparency, fairness in credit decisions, and fraud prevention.

The framework promotes scalable and compliant AI practices that align with organisational goals and societal expectations. It provides tools to evaluate the ethical and practical implications of AI use, encouraging staff to consider the intended purpose, audience, and potential risks of deployed systems.

To further embed contextual relevance, **the framework supports organisation-wide collaboration, integrating input from diverse teams**, including technical experts, compliance officers, and frontline staff. By fostering a comprehensive understanding of AI's role in specific contexts, the framework ensures that its adoption is meaningful, ethical, and aligned with both organisational and societal objectives.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The impact of the AI literacy practices introduced has been substantial in improving individuals' knowledge and understanding of AI systems. These initiatives have enabled users to make more informed, ethical, and responsible decisions in their interactions with AI, fostering greater awareness of both opportunities and risks. For instance, the **AI Literacy Toolbox and training programs** have contributed to reducing knowledge gaps, particularly among underrepresented groups, by equipping them with essential skills for navigating an AI-driven world.

The organisation monitors these impacts by employing tools such as literacy assessments, user feedback mechanisms, and engagement metrics from interactive resources. Additionally, periodic evaluations are conducted to measure participants' understanding of AI-related concepts, their ability to identify risks, and their capacity to apply learned principles in real-life scenarios. These methods ensure that the practices are achieving their intended goals and provide insights for continuous improvement.

Which challenges has the practice addressed and what issues is the organisation still facing?

The AI literacy practices have successfully addressed several key challenges, such as the lack of foundational knowledge about AI among diverse groups, including underrepresented populations. They have helped bridge gaps in understanding how AI systems work, their risks, and their ethical implications. These efforts have empowered individuals to make better decisions, avoid misuse, and navigate the complexities of AI more effectively.

However, we still face challenges. These include ensuring widespread **accessibility to AI literacy resources**, overcoming language and cultural barriers that might limit participation, and addressing the rapidly evolving nature of AI technology. Additionally, there is an ongoing need to counter misinformation and foster trust in AI systems while continuing to mitigate the risks of bias, privacy violations, and unethical AI use.

Is the organisation planning to change and/or improve the practice?

We are committed to continuously improving its AI literacy practices. It plans to adapt and expand its resources to keep pace with the rapid advancements in AI technology and address emerging challenges. Future improvements include enhancing **accessibility to materials** by offering them in multiple languages, refining interactive tools to better assess and support learners, and incorporating **more advanced content** on ethical AI use, sustainability, and risk management.

Additionally, the organisation intends to strengthen its efforts **in reaching underrepresented groups** and tailoring resources to meet diverse needs. Feedback from participants and ongoing evaluations will guide these improvements, ensuring the practices remain relevant and effective.

Asimov AI S.R.L.

On the organisation

Name: **Asimov AI S.R.L.**

Size: Micro (1 to 15 employees)

Headquarter: Italy

Sector: Public administration

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Asimov AI provides its customers (e.g. government institutions, businesses and business associations) with advanced AI legislative services.

Our tools are only available for internal uses to officials working inside institutions and consultants at the service of companies or associations. Since our tools deal only with narrow administrative tasks, previously conducted manually, none of our systems are assessed as high-risk.

On the AI literacy approach

Status: Fully implemented

Target group: Other persons dealing with the operation or use of the system(s)

We currently support **three AI literacy initiatives**. The first one is targeted at Asimov AI's human resources, the second one to Asimov AI's customers, and the third one to the general public.

Whenever we sign a contract with new customers, we organise one or more induction calls with the teams that will use our platform. During these calls, we explain the functioning of both our platform and the underlying AI models. Participants include team leaders and officials who will perform legislative tasks automated by our tool.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The initiative is designed with the assumption that **participants generally lack prior technical knowledge**, experience, education, and training in AI. Therefore, we ensure that basic AI concepts are explained in a very accessible manner. We are, however, facilitated by the fact that our targets are **domain-experts**, making it is easier to explain how AI works in this context (see below).

How does the practice take into account the context in which the AI system(s) is/are used?

The practice takes into account the context in which the AI systems are used by tailoring the induction sessions to reflect the specific environments and applications relevant to our customers. During these sessions, we focus on **demonstrating how our AI platform and models integrate into the customers' existing workflows** and address their unique legislative tasks. This contextual approach ensures that participants understand not only the technical aspects of the AI tools, but also how these tools can enhance their specific processes and outcomes.

In particular, we carefully examine the nature and causes of **hallucinations in the legislative domain**, explain how they can negatively affect outcomes and to what extent they can be mitigated. This is crucial to avoid the emergence of false expectations from AI and to improve human control over our AI models.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The impact of the AI literacy initiative for Asimov AI's customers has been positive, with several notable outcomes. Customers have reported **increased confidence and competence in using our AI platform**, leading to more effective and efficient execution of their legislative tasks. This has resulted in improved satisfaction with our products and services, as customers are better equipped to leverage the full potential of our AI tools.

To monitor the impact of these initiatives, Asimov AI employs simple **feedback mechanisms, having the CEO regularly call customers** to check via follow-up interviews whether their understanding of AI has improved thanks to the initial training. This feedback helps us identify areas for improvement and tailor future sessions, if needed, to better meet customer needs. Regular check-ins with customers also provide opportunities to discuss their experiences and gather insights on how the AI tools are performing in their specific contexts. This ongoing dialogue ensures that we remain responsive to customer needs and continue to refine our practices to deliver maximum value.

Which challenges has the practice addressed and what issues is the organisation still facing?

Since we are a very small company, and every working hour is crucial, it is very important to put this AI literacy practice in the context of customer training sessions, which are necessary for them to learn how to use our platform. Hence, so far, it would be impossible to conduct AI literacy initiatives for our customers outside of these moments.

Is the organisation planning to change and/or improve the practice?

When we will have sufficient financial resources and our customer base will increase, we will surely try and improve this practice. for example by creating an AI academy for them, calling external AI experts to carry out classes and continuous learning initiatives.

Assicurazioni Generali S.p.a.

On the organisation

Name: **Assicurazioni Generali S.p.a.**

Size: Large (250 employees or more)

Headquarter: Italy

Sector: Insurance and Asset Management

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

AI systems are provided and/or deployed to improve efficiency, effectiveness and risk mitigation in all the main steps of the insurance value chain (from product design to pricing and underwriting, marketing & sales, claims management, and internal operations).

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff

The practice is designed for **all employees of the Generali Group** as part of a **global digital upskilling and reskilling program launched in 2019**. It consists of two main components:

1. a **global platform for synchronous/asynchronous e-learning** (*WeLearn*), offering a large portfolio of training sessions organised according to the technical complexity of the content and the level of employees' involvement in the use or development of AI systems.
2. a **set of internal academies** (*New Roles Schools*) **for specific roles** such as Data Scientists, AI Business Translators, Smart Automation Experts, Actuaries, Accountants, and CRM Experts.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The practice includes a **portfolio of basic courses for all employees**, aimed at providing a **common set of skills** and knowledge to understand what AI is, how it is used at Generali, and its potential impacts in the near future.

Employees who directly use or interact with AI systems can access intermediate courses that offer additional technical deep dives into previously presented basic concepts and/or introduce new topics on specific AI technologies and methodologies. These intermediate courses are intended to provide the necessary skills and knowledge to understand how Generali's AI systems work and how to use them responsibly.

Employees involved in the development and/or maintenance of AI systems have access to a set of advanced training resources, such as classes with external experts and trainers, to ensure the proper and responsible development of AI systems. **Access to intermediate and advanced training is subject to specific assessments** to ensure alignment between the content delivered and the employees' preparation level.

Additionally, **internal academies** (*New Roles Schools*) have been established **in collaboration with external universities and research centres** to create new AI-related roles (e.g., Data Scientists, AI Business Translators, Smart Automation Experts) or to provide new, specific AI skills to existing roles (e.g., Actuaries, Accountants).

How does the practice take into account the context in which the AI system(s) is/are used?

All the training sessions at all levels are focused on **examples from the insurance sector** and, whenever possible, include **real cases of AI systems** and applications developed and/or used within the Group.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The program contributed to the Group's transformation journey by supporting its digital transformation, improving employee skills, and promoting innovation. Some KPIs include:

- **more than 5,200** Generali employees had the opportunity to cover positions related to STEM disciplines (Science, Technology, Engineering, and Mathematics) and have used their STEM skills in daily responsibilities.
- **about 40% of participants** saw an evolution in their role after completing the training programs.
- **over 18 new market services** were launched thanks to the skills acquired via the program.

From a qualitative point of view, the program helped build a **company culture** based on continuous learning, where employees feel ownership of their upskilling journey. It also facilitated **collaborations with external universities and research centres**, enhancing knowledge and innovation in machine learning, data science, and artificial intelligence.

The impact of this literacy program is constantly **monitored through several KPIs**, such as the number of employees participating in the offered training courses; the percentage of courses successfully completed by participants; the skills impact, which measures the increase in specific skills of employees after completing the courses; participant satisfaction, expressed through ratings and feedback on the quality and usefulness of the courses; and the percentage of participants who have seen an evolution in their role after completing the training programs.

Which challenges has the practice addressed and what issues is the organisation still facing?

The development of this practice helped address the challenge of the lack of AI skills in the job market. It offered a great opportunity to reskill people, creating new roles from internal resources who already had a deep knowledge of the company. AI literacy also supported the digitalisation of the Group by fostering **familiarity with and trust in AI systems**, thus accelerating the adoption of the latest AI technologies, such as generative AI.

The **continuous development of AI technologies, applications, and roles** represents a challenge in correctly directing efforts to keep this practice always up to date.

Is the organisation planning to change and/or improve the practice?

The practice is subject to a **yearly review,** addressing both new topics (e.g., Generative AI basic training or the New Role School for Accountants, both added in 2024) and further deep dives into already covered topics (intermediate/advanced trainings). The update process involves a **top-down identification of macro trends and a bottom-up report** from business lines on their specific needs.

Booking.com

On the organisation

Name: **Booking.com**

Size: Large (250 employees or more)

Headquarter: The Netherlands

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed: Numerous AI systems including those for workplace productivity.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff, i.e., the **Legal and Public Affairs teams**.

While there is a **wider training plan at work for the entire company**, for the purposes of **this example,** we decided to cover **how non-technical teams are improving AI literacy**.

We also developed a video/podcast series that included subtitles and written handouts so as to be **inclusive** of both those who learn best visually, and those who may need subtitles due to disability.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

This **practice was designed specifically for legal and public affairs professionals** at the company, who tend to be highly educated in general, but less so in the particular field of computer science. While some members of the group have a high level of technical knowledge, we were aware that there was an opportunity to close gaps in knowledge for many members of this wide team.

We designed the **training in three parts**, with the first defining ***AI Basics*** to ensure that everyone would use the same terms for the same issues or technologies and understand the differences between AI and ML concepts (such as what an LLM is vs classic machine learning). From there, we moved into **specific AI for the company and applied the basic concepts**, and then finally part 3 included **an analysis of the regulatory environment** around AI and intersections with the types of law that team members already practice. This highly specialised training meant that legal team members engaged more deeply than if it were simply technical training.

How does the practice take into account the context in which the AI system(s) is/are used?

We focused on **long-term AI and ML projects at Booking.com** so the widest possible number of team members would understand the concepts. **For instance, a section of the training went through the history of ML modelling used to fight fraudulent payments on the system**, and the AI models used to combat credit card fraud today. This example works well with a legal team that regularly engages with fighting fraudulent behaviour and can comfortably engage with the context.

What has been the impact of the practice so far and how does the organisation monitor such impact?

As a test ahead of the EU AI Act coming into force, we wanted to see if this training would be used and how it could make a difference to legal and public affairs team members. In quantitative terms, we track the **number of team members** who watch the training or listen to the podcast version and monitor how many join an **internal group on AI updates and discussion**. Further live **training on AI risk assessments** was one of the most highly attended trainings in 2024.

Which challenges has the practice addressed and what issues is the organisation still facing?

One major challenge was ensuring that a very **diverse team**, with acutely different cultures and backgrounds, **could all understand the same principles of AI**, including AI ethics. By designing a training that aimed to equalise knowledge between team members at a fairly high bar, this helped alleviate misunderstandings that can happen from different perspectives and language backgrounds.

Is the organisation planning to change and/or improve the practice?

We plan to **iterate on this practice** and continuously improve with updates to the training as needed, similar to the yearly data protection training issued by the company. We also plan on **more specialised training modules** in the foreseeable future, with **hands-on training in AI** for employees who are eager to learn more.

Criteo

On the organisation

Name: **Criteo**

Size: Large (250 employees or more)

Headquarter: France

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

We develop and use AI to power and personalise online advertising for internet users. According to our current assessment, AI systems provided/deployed are not high-risk.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff, i.e., **R&D and Product Analytics teams**

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The practice involves **voluntary training.** The audience is technical only. We clarify expectations around technical knowledge, **dividing participants in complete beginners in machine learning or experienced employees,** who can follow more advanced courses. The selection is made on the basis of **a written application.**

How does the practice take into account the context in which the AI system(s) is/are used?

The use cases presented in the training are directly **linked to our business** and to our usage in development and deployment of AI (AI in AdTech). The **courses are taught by employees developing internal AI systems or researching** on topics important for the company.

What has been the impact of the practice so far and how does the organisation monitor such impact?

17 sessions were held since Q4 2016, for more than 130 bootcampers. The sessions were interrupted during Covid between Q1 2020 and Q3 2022. The qualitative impact is indirect: new connections were created between different R&D and Product teams, with an **increased capacity to develop AI applications**, and support to career change.

Which challenges has the practice addressed and what issues is the organisation still facing?

The practice **addressed the following challenges**:

- ramping up AI for Software Development Engineers and Product Analysts,
- acquiring the needed vocabulary to discuss AI-related matters,
- formalising AI problems, while demystifying the topic.

Remaining issues are connected for example to:

- the required personal investment from employees,
- the demanding program from a content and time perspective,
- the need to have more in-house experts and trainers to train employees.

Yet, overall, the cost-benefit remains positive because these trainings enable a better understanding of AI and a responsible handling of data and AI development in accordance with professional standards.

Is the organisation planning to change and/or improve the practice?

We continuously improve the practice by collecting **feedback** at the end of each session (**via survey**) and acting on that input.

Initially, each participant had to have a **single project to test and implement during the training**. We have made this easier by allowing participants to collaborate on projects. We also allow participants to perform the training even if they do not have a specific project.

EnBW Energie Baden Württemberg AG

On the organisation

Name: **EnBW Energie Baden Württemberg AG**

Size: Large (250 employees or more)

Headquarter: Germany

Sector: Energy

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

We have numerous applications in use along our entire value chain that enable us to operate both efficiently and innovatively. Through a secure, collaborative, and responsible handling of data and AI, we develop solutions that significantly contribute to shaping the energy landscape of tomorrow.

For instance, we employ predictive maintenance to proactively plan our service activities, thereby avoiding costly downtimes. Our algorithms for meter reading plausibility precisely verify consumption data, minimize potential error sources, and enhance transparency in energy management. Additionally, robust forecasting models allow us to predict future generation quantities with pinpoint accuracy, ensuring that energy production is optimally aligned with current demand.

The natural use of data and AI by all our employees forms the foundation of our success. EnBW is an organisation where evidence-based decisions are already shaping the future. Through the consistent use of modern technologies, we contribute sustainably to the development of a forward-looking and secure energy future.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Our practice takes into account the varied technical knowledge, experience, and education of the target group through tailored programs:

- **Foundational Training for Beginners:** Our courses provide comprehensive basic knowledge to ease the entry into the world of data & AI.
- **Advanced Training:** For experienced data and AI experts as well as strategic decision-makers, we offer specialised training that imparts in-depth insights and practical skills.
- **Use of Innovative Training Methods:** Through game-based approaches and lightweight activation formats, we promote tool-specific competence in data & AI while addressing diverse learning needs.

Through these differentiated approaches, we ensure that all employees—regardless of their starting level—acquire the necessary skills to effectively utilise data & AI.

How does the practice take into account the context in which the AI system(s) is/are used?

Our practice fully considers the context in which data & AI systems are applied, namely it considers:

- **Practical Application:** One program focuses on the real-life use of data & AI in everyday operations, taking into account industry-specific frameworks and use cases.
- **Strategic Integration:** Another program supports decision-makers in understanding and optimising data-driven decision processes, thereby strengthening the organisational culture.
- **Expert Development:** We actively foster the training of data and AI experts who identify and implement innovative use cases.
- **Game-Based & Story-Driven Training:** These innovative formats allow participants to deepen their skills through realistic scenarios and learn the practical application of data & AI in an engaging manner.
- **Comprehensive e-Training:** A broad e-Training curriculum ensures that all employees continuously expand their knowledge and adapt to emerging challenges.

This context-driven approach ensures that data & AI systems are used responsibly and effectively, enabling all employees in the organisation to be trained according to their specific needs.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The implementation of our data & AI practice has yielded significant qualitative and quantitative results:

1. Qualitative KPIs:
    a. High employee satisfaction, demonstrated through regular surveys and feedback.
    b. Effective integration of acquired knowledge into everyday work practices.
2. Quantitative KPIs:
    a. An increasing number of participants in our training programs.
    b. A marked improvement in data & AI competence, as evidenced by standardised tests.

The ongoing performance monitoring enables us to continuously evaluate and refine our programs.

Which challenges has the practice addressed and what issues is the organisation still facing?

Our practice has successfully addressed several challenges. For example, in view of **varied levels of prior knowledge**, the tailored content of our practice ensured that all employees, regardless of their starting level, were optimally trained and supported.

However, some challenges still remain and include:

- **The rapid technological change**: The fast-paced development in data & AI requires constant updates to training content to keep it relevant.
- **The integration of new tools**: Implementing modern technologies demands continuous adaptation of training formats and methods.

These ongoing challenges are addressed through **regular evaluations and continuous improvement** of our programs to ensure they meet evolving demands.

Is the organisation planning to change and/or improve the practice?

Our organisation plans to continuously enhance the practice and align it with the dynamic technological landscape via:

- **A Mandatory AI Competency Training:** A comprehensive program has been implemented to ensure that every employee gains a profound understanding of the diverse applications of data & AI and is enabled to apply these technologies in practice.
- **Innovative Training Methods:** We will further expand the use of game-based approaches and lightweight activation formats to create interactive and engaging learning environments.
- **A Regular Evaluation:** Through ongoing feedback and targeted assessments, we continuously update our training content to reflect the latest technological advancements and the evolving needs of our employees.

Enzai Technologies

On the organisation

Name: Enzai Tehnologies

Size: Micro (1 to 15 employees)

Headquarter: United Kingdom

Size: ICT

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

Type of AI system:

Enzai provides an AI governance, risk and compliance software solution that helps organisations understand and manage the risks that come with AI, while meeting their emerging regulatory obligations. We work with large, international organisations (such as members of the Fortune 500) as customers to help them implement and operationalise AI governance programs at scale. As a result, we need to ensure that our internal teams are up to speed with all aspects of AI (including those that relate to risk management, governance and compliance).

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff

In order to assist internally with our own AI literacy requirements, we have developed a specific program to help our employees get up to speed with everything they need to know (the "**Enzai AI Literacy Program**"). The goals of the Enzai AI Literacy Program are to ensure a high level of AI literacy among Enzai employees, so that they understand both the opportunities and risks that come with AI. It is made up of two key elements, each of which are set out below in more detail. This combination of AI Guides and Training works in concert to develop a durable AI literacy capacity within Enzai.

1. AI Guides

Type: Series of brochures
Audience: All stakeholders within Enzai
Description: Our AI Guides are a series of three brochures, which include: (i) the Introduction to AI Guide, which outlines the opportunity that AI presents, an overview of some of the risks that AI can pose and the consequences of these risks materialising, and both general and context-specific guidance for common audiences within a company; (ii) Drafting your AI Policy – A Practical Guide, which lays out key areas an organisation should consider when preparing and adopting an AI policy and includes guidance on, amongst other things, establishing AI principles, implementing technical safeguards and creating AI governance gates; and (iii) Essential Guide to AI Governance, which provides step-by-step guidance on how to develop all elements of an AI governance program and includes templates and case studies to understand how AI governance concepts translate into practice.

2. AI Governance Training

Type: Instructor guided learning
Audience: All stakeholders within Enzai (can be tailored to an organisation's needs)
Description: Enzai provides in-person, virtual and pre-recorded training sessions at both: (i) a general level for everyone in our organisation; and (ii) a role-specific level tailored to common audiences within our organisation. For example, a virtual AI training session for a general audience will typically include: the potential of AI, an overview of AI governance regulations and standards, a deep dive into the EU AI Act and its upcoming requirements, and next steps to achieve AI literacy, before ending with a Q&A session. Instructor guided learning is available for all new and existing Enzai employees and for other stakeholders. Participants are awarded an Enzai-issued certificate upon successful completion of these sessions.

The Enzai AI Literacy Program is primarily geared toward **all stakeholders within Enzai,** to reflect the fact that robust AI governance is a cross-functional endeavour that requires participation from people of different backgrounds. The ultimate objective of the Enzai AI Literacy Program is to enable an appropriate level of AI literacy for everyone within an organisation. The **general elements** of the Enzai AI Literacy Program are meant for everyone in an organisation, while its **role-specific elements** are tailored for each of the following common roles within large organisations: (i) AI Governance, Privacy and other IT Risk Functions; (ii) Operators; (iii) Business Areas; (iv) C-suite and Board; (v) Procurement; (vi) Designers and Developers; (vii) Data Science and Data Governance; and (viii) Learning & Development.

Within Enzai, employees review our AI Guides and undergo our **general AI Governance Training**. We also make role-relevant training available to all members of our team. For example, Enzai employees who help our customers use our AI governance software to align with regulations receive our training on AI laws, privacy laws, data governance and AI procurement.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

We understand that each internal audience will have different levels of knowledge, experience, education and training around AI. The Enzai AI Literacy Program has been designed to **'meet these audiences where they are'** and ensure that the level of training and support provided is appropriate.

Among our AI Guides, the '**Introduction to AI Guide'** is intended to be a good starting point for those new to the technology, so that they can understand some of the core concepts in the space. **'Drafting Your AI Policy – A Practical Guide'** is more suited for legal and compliance professionals, who will understand core risk management concepts but may not have applied these concepts in an AI-context before. And the **'Essential Guide to AI Governance'** is intended for practitioners (such as data scientists, ML engineers and/or AI governance professionals) to understand how to effectively govern the tools they are using and

building. Our AI Governance Training targets both general and role-specific audiences and can be quickly adapted and tailored to meet the needs of the individuals on the course.

How does the practice take into account the context in which the AI system(s) is/are used?

We are used to working with large, sophisticated teams of cross-functional stakeholders across different geographies and time zones. We have taken all of these learnings and built them into the **Enzai AI Literacy Program for our internal use**. As a result, we have become well versed at ensuring that we capture all the nuance necessary to cater for a wide range of internal and external stakeholders.

Throughout the Enzai AI Literacy Program, we encourage Enzai employees to build **durable AI governance capacity** upon foundational concepts such as responsible product/ service design, risk/ quality management and stakeholder engagement (amongst other things). Developing AI governance capacity, focused around these concepts, can inform considerations of the specific opportunities, risks and mitigations that are best suited to AI use in any given context.

The Enzai AI Literacy Program also emphasises an **iterative approach to responsible AI**, which allows Enzai employees to prioritise quick wins while laying the groundwork for more transformative AI initiatives over time. This adaptability ensures that companies can develop AI literacy programs that are practical, relevant and sustainable within their specific operational contexts.

Additionally, we frequently tailor our AI Governance Training for Enzai employees **servicing specific industries**, such as financial services, health care and cyber-security.

What has been the impact of the practice so far and how does the organisation monitor such impact?

As described earlier, the Enzai AI Literacy Program includes our AI Guides and our AI Governance Training. Within Enzai, we measure the success of our AI Literacy Program by **tracking the number of employees receiving training**, which format they received it in, **the feedback** that they provide after receiving training, and the **number of external forums and events** at which they share their AI governance expertise. The metrics we use here can vary - we have previously included narrow KPIs focused on organisational engagement (such as numbers/percentages of employees that have received general and/or role-specific training), as well as broader KPIs more focused on the impact of the Enzai AI Literacy Program on organisational AI governance processes (such as average intake time for a new AI system and percentage of AI systems that have been reviewed).

The feedback that we have received to date suggests that the Enzai AI Literacy Program has had a **significant and lasting impact** within our organisation. Our iterative approach, along with a clear and targeted delivery, has rapidly enabled our teams to understand what's different with AI technology and regulation and to rapidly develop our AI governance maturity.

Which challenges has the practice addressed and what issues is the organisation still facing?

The Enzai AI Literacy Program has faced two key challenges, which we are addressing as follows.

First, employees and other stakeholders often find the **pace of change in AI technology**, adoption and policy to be challenging. The Enzai AI Literacy Program addresses this by focusing on **foundational concepts** of AI governance rather than on any given AI system or specific risk mitigation. As mentioned, this covers concepts such as responsible product/ service design, risk/ quality management, and

stakeholder engagement (amongst other things). By focusing on the fundamentals of AI governance, we seek to ensure that an organisation's approach to AI governance is durable and evergreen.

Second, we are frequently asked by our team that our AI Governance Training be amended to cater for **specific industries and common use cases**. We do tailor our AI Governance Training in this way and always develop and use materials that we consider the most relevant to, and most likely to be effective with, the specific audience that we are addressing. For example, we frequently walk through a specific AI use case within an organisation to show how certain risk/quality management principles translate into practice. It is this **'principles into practice' element** that is central to all aspects of our AI literacy training efforts, as it is the key to ensuring these efforts are most effective.

Is the organisation planning to change and/or improve the practice?

We review both elements of the Enzai AI Literacy Program monthly and revise them to reflect feedback as well as the latest developments in technology, policy and best practices. Given the effective date of 2 February 2025 for the AI literacy requirement of the EU AI Act, we have experienced steadily increasing demand for the Enzai AI Literacy Program from within and continue to receive high-quality feedback, which we will incorporate to improve our approach and materials.

Fastweb S.p.A.

On the organisation

Name: **Fastweb S.p.A.**

Size: Large (250 employees or more)

Headquarter: Italy

Sector: Telecommunication, ICT, Energy

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

Type of AI system(s):

Fastweb currently operates over 90 AI Systems, all of which follow a structured AI Governance process. This includes an early-stage AI Risk Assessment to identify, by design, Fastweb's role according to the AI Act; the AI System's risk level according to the AI Act; additional AI-related risk profiles, based on the context of use of the AI system and its impact according to a broader Regulatory Framework (e.g. impact on personal data, copyright, ESG, etc.).

Fastweb's AI Systems are both deployed internally and provided to our B2B clients. Internally, most AI systems enhance effectiveness and efficiency across various departments such as Technology, Marketing, Security, HR, Finance, Help Desk, Internal Audit, Compliance, and Consumer (such as AI systems to navigate internal procedures, analysing data, filtering communication, preventing customer churn, checking and analysing documents, etc.).

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

Over the past 18 months, we have built an **AI Compliance Culture** through an intensive awareness program defining clear principles, rules, and codes of conduct to make informed, risk-based AI decisions. **Key AI literacy pillars** include**:**

1) **AI Governance Model:** implementing an AI **Organisational Model** and an **AI Code of Conduct** defining and documenting roles, responsibilities, principles, processes, rules and prohibitions for the adoption, usage, supply and purchase of AI.
2) **Accountability**: defining roles and responsibilities and formally appointing **AI-SPOCs (Single Points of Contact)**, trustworthy trained advisors to spread AI literacy within the company.
3) **Comprehensive AI Risk Assessment Framework**: implementing process and tool to qualify the **risk score** for every AI project, addressing them through appropriate **mitigation measures** according to AI Act, Data Protection, Copyright, Sustainability regulations, etc.
4) **Role-based AI training and Awareness**: providing general and specific training on AI Governance and Risk Assessment for all employees, including top management and AI-SPOCs.
5) **Multi-channel approach**: offering training sessions in person, online, live and offline, maintaining a Learning Hub with 300+ free courses on AI and sharing news on AI-risk, rules and obligations.
6) **Information to affected person:** providing clear instructions, information, and warnings for AI systems usage;
7) **Documentation:** maintaining technical documentation, policies and templates.

All the above-mentioned practices also apply to AI Systems provided to **Clients** and purchased by **Suppliers** (except for numbers 4 and 5). Our AI Literacy practices are addressed to everyone within and outside our company, with no differences depending on gender, ethnic group or disabilities.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The training sessions at Fastweb are tailored to different audiences based on their technical knowledge, roles, and responsibilities:

- **AI-SPOCs Training**: Specific training on prohibited practices and high-risk AI systems, for them to be able to promptly identify and eventually block any prohibited AI use case in their departments. AI-SPOCs also participate in AI Risk Assessment training with the technical team to ensure trustworthiness in the assessment process.
- **General Company Training**: All employees receive general training on the AI Act and the AI Governance Process implemented within our company to ensure compliance and accountability.
- **Department-Specific Training:** Departments receive tailored training based on their activities and potential implications on prohibited or high-risk AI practices.
- **CEO Training**.

Besides the trainings, Fastweb offers company-wide webinars and workshops held by the technical team on internally developed AI systems. Moreover, Fastweb's employees are kept informed about new AI initiatives and regulations updates through internal communications and the AI Compliance Team is available for consultation on AI-compliance related topics.

How does the practice take into account the context in which the AI system(s) is/are used?

We have developed an **AI Risk Assessment** framework on **context-specific risks.** Our AI Risk Assessment tool identifies the purpose and context of use for each AI system (internally deployed or externally provided), since the same AI system can have different implications depending on its context. Proactive questions in the assessment help identify context-specific risks (e.g., processing personal data, use by minors, web scraping, or automating company processes) and calculates additional risk scores. **Ad hoc mitigation measures** are issued to address identified risks and to strengthen literacy, both for internally deployed and externally provided AI systems, in a consulting perspective for our clients, to **spread AI literacy** and address their potential shortcomings.

In addition, **AI SPOCs** are appointed in each company department because they are individuals with in-depth knowledge of the business and their department. This makes them apt to provide a **vertical perspective** that, if viewed only with a top-down approach, might risk missing certain aspects. For the same reason, AI-SPOCs are entitled and trained to autonomously perform the AI Risk Assessment.

For General Purpose AI systems, where context is difficult to identify, Fastweb has implemented an **AI Code of Conduct** to regulate all possible uses of AI, strengthening AI literacy.

What has been the impact of the practice so far and how does the organisation monitor such impact?

In this description we are dividing between internal and external practices.

1) **Internal AI Literacy practices**
   - **AI Governance Model**: the AI Organisational Model and Code of Conduct have been well-received by the employees and have allowed us to structure a more formal governance model with well-defined roles, responsibilities – and related appointments -, process and AI-culture. These are reviewed and updated every **6 months**.
   - **Accountability**: AI-SPOCs play a crucial role in the decentralised AI Governance System, serving as a reference point for AI-related topics.
   - **Comprehensive AI Risk Assessment Framework**: our AI risk assessment tool and process allowed to assess more than 90 use cases and to issue ad hoc mitigation measures. Through this process, we have been able to promptly block a prohibited usage of AI. The AI Risk assessment is subject to trimestral review and it is constantly adjusted following regulatory updates.
   - **Role-based AI Training and Awareness**: Differentiated training has been effective, with AI-SPOCs becoming more independent and employees aware of company practices for assessing AI system risks. Webinars on deployed AI systems have high participation rates. The training sessions are continuously updated.
   - **Multi-channel approach**: offering both live and offline training allows for interaction between participants and access to training documentations as needed.
   - **Information to affected person:** providing AI systems with clear instructions on use, limits and risks allows for a more responsible adoption of AI.
   - **Documentation:** having a well-established documentation facilitates processes and support the work of people. The documentation is reviewed on a semestral basis.

2) **External AI Literacy practices:** Having defined rules for the purchase or supply of AI allows for more control on compliance and enables Fastweb to responsibly adopt trustworthy AI solutions.

As for controls, we are developing a I, II and III level **control plan.**

Which challenges has the practice addressed and what issues is the organisation still facing?

In the last 18 months, our practices have successfully addressed several challenges. For example, the end-to-end AI compliance system has enabled us to **census** and analyse the risks of AI systems within the company, clearing the **backlog** of existing AI systems. It has also allowed us to appoint specific points of contact for AI topics, improving communication and workflows. A key challenge was **onboarding** these contacts and providing them with specific training on the AI Act and AI Risk Assessment, making them trusted advisors for our Compliance team.

Also, the AI Risk Assessment tool operates autonomously to identify the risk levels of AI systems, allowing trained personnel to perform assessments independently without the supervision of the AI Compliance Team. **Automating** the release of ad hoc mitigation measures, considering the context of use and regulatory framework (Data Protection, Copyright, ESG), remains a challenge.

Our AI Governance Model and AI Code of Conduct regulate AI system usage, providing rules and best practices and allowing for multiple levels controls. Published on our intranet, it ensures everyone is aware of AI governance at Fastweb. However, preventing "**shadow-AI**" practices—AI developed or purchased outside formal governance—remains a challenge. Ongoing challenges include also **keeping up with regulatory updates** and **uncertainties** in best practices, such as handling data deletion opt-outs.

Is the organisation planning to change and/or improve the practice?

In accordance with our AI governance model, Fastweb will review all documentation adopted during 2024 due to a semestral deadline. Recognising the rapid evolution of AI technology and best practices, it is essential for Fastweb to keep its documents, processes, and tools up-to-date.

To maintain high staff awareness, Fastweb will conduct widespread training throughout 2025, emphasising the ethical, human-centred, and sustainable use of AI, as well as AI-related risks and best practices to protect human rights.

Fastweb is committed to improving its AI Compliance System and literacy practices following regulation's update (e.g. we have already updated our AI Risk Assessment tool following the measures recently issued by the EDPB and the Italian Privacy Authority) and according to the results of the controls we are planning and to the future experience.

IBM

On the organisation

Name: **IBM**

Size: Large (250 employees or more)

Headquarter: U.S.A.

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

IBM provides AI products for clients to build, scale and govern custom solutions across the AI lifecycle. This includes AI products that accelerate generative AI into core workflows, driving automation and productivity, personalised AI assistants and AI agents, and IBM® Granite™, a family of open, performant and trusted Large Language Models. The people affected by our AI system, and whether the system is high-risk or not, depends on each specific use-case of our clients.

IBM also leverages AI across its own operations to enhance productivity, streamline processes, and elevate employee experiences. This includes:

- Enhanced Decision-Making and Efficiency: Through its watsonx platform, IBM augments decision-making by automating data analysis, reducing routine tasks, and enhancing productivity across business functions.
- HR Transformation: Over the last eight years, IBM embedded AI in its HR processes, by automating administrative tasks and using AI-enabled chatbots to improve employees' experience with HR services.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff, including **all employees**; Other persons dealing with the operation or use of the system(s), i.e. **clients.**

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

To support employees with continuous learning, IBM encourages them to complete at least **40 hours of learning per year.** Employees have access to numerous modules on AI **via the IBM Your Learning Platform**, potentially including many hours of learning. It is up to employees to choose the most appropriate learning tailored to their role and tasks, based on the suggestions made by the Platform, which itself uses AI to target the learning appropriately.

The different levels of technical knowledge and experience of employees is taken into account by providing **basic AI learning**, such as courses in AI fundamentals, Trustworthy AI & AI ethics, AI for business, as well as **more technical courses**, such as AI design skills, AI Data Scientist courses or specific learning on Generative AI.

How does the practice take into account the context in which the AI system(s) is/are used?

The **watsonx challenge allows employees to use IBM AI products to devise solutions for their specific work context.** IBM also provides clients with personalised AI-Based Training adapted to their specific use and IBM AI product. IBM Consulting uses watsonx for customised learning experiences, offering digital tutors and AI-driven learning plans to support adaptive, efficient skill acquisition. In collaboration with Coursera, IBM provides training for use of IBM AI products.

What has been the impact of the practice so far and how does the organisation monitor such impact?

Globally, IBM employees complete 80 hours of learning per year on average – this is **tracked for each individual employee via the Your Learning platform**. This allows employees to keep their skills up to date for their current role or upskill for potential future roles or career changes. Around 60% of IBMers took part in the watsonx challenge. This has led to a better **understanding of AI amongst employees, as well as fostering innovation** and enabling them to explore the potential of IBM AI products in their own work.

Which challenges has the practice addressed and what other issues is the organisation still facing?

The challenge with AI is the fast pace and scale of transformation - in IBM, responding to this is only possible by adopting a **continuous learning culture**. Upskilling employees in AI also **supports successful deployment of the tools in internal IBM processes,** where there can be challenges as part of the process of change management. This includes increasing trust and confidence in the use of the tools by managers and employees, e.g. by inviting employees to test IBM AI products, which supports **identification of the tasks** which benefit most from the use of AI. This helps with the challenge of rapidly assessing which tasks will benefit most from the use of AI and automation in terms of increasing productivity and augmenting humans. It also helps mitigate business costs.

Is the organisation planning to change and/or improve the practice?

Given IBM's commitment to continuous learning, the **online learning available to employees is constantly changing** to reflect adapting skills needs and changing job roles and tasks.

Mural

On the organisation

Name: **Mural**

Size: Large (250 employees or more)

Headquarter: U.S.A.

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Mural is a digital whiteboard tool that works like a large, endless canvas where people can work together online, similar to having a giant wall where users can stick notes, draw, and share ideas. From a provider perspective, Mural developed certain AI features leveraging *Microsoft Azure Open AI.* The main AI features are:

- Summarise: Leverage Mural AI to create a summary from multiple text inputs and sticky notes included in the whiteboard.
- Cluster: Leverage Mural AI to automatically move related sticky notes together into named groups.
- Classify sticky notes by sentiment: The colour of the sticky notes changes to either green (positive), yellow (neutral), or red (negative).

- AI Chat: Mural's AI chat feature uses natural language processing to make interactions with AI feel more familiar and intuitive. Users can use prompts to engage with AI, build on or refine those prompts, and unlock more complex capabilities like translating content to another language, or checking grammar or spelling.
- AI powered mindmaps: users can leverage AI to create a mind map in seconds.

The primary users impacted are the end users which are registered users with an active subscription and visitors that are invited to collaborate with them.

From a deployer's perspective, Mural utilises various *SaaS services* that incorporate AI features for internal use.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

We have already implemented a mandatory **AI training program for all staff in 2024** with a completion rate of 93%. Additionally, we have developed and conducted a specialised live **interactive training for our AI team**. This training focused on the **EU AI Act's key provisions, prohibited practices, and high-risk categories.**

Specifically, taking into account the technical **IT background of the AI team**, in order to **make complex legal provisions accessible to non-legal professionals**, we developed an interactive whiteboard featuring a **comprehensive mind map with visual elements**, templates, industry resources and direct references to the EU AI Act provisions. Here you can find a video about the main features of the AI literacy whiteboard.

How does the practice take into account the context in which the AI system(s) is/are used?

The company-wide training provides general guidelines that can be **applied across various sectors and audiences**, especially given the rapid evolution of technologies. For our AI development team, we conducted **a live training focused on AI risk categories and specific requirements of the EU AI Act.**

From a deployer perspective, a recent risk mitigation we implemented in our procurement process involves asking the business owner if the new service to be purchased or the service up for renewal includes or has recently included AI features. If yes, we incorporate security assessments and specific contractual legal provisions to ensure our data is only used for the provision of the service and it is not used to train AI models.

What has been the impact of the practice so far and how does the organisation monitor such impact?

Our practice has demonstrated impact through 2 strategic training initiatives:

A general workforce training: The organisation successfully delivered comprehensive AI awareness training, achieving a 93% completion rate among all employees. This initiative established a foundational

understanding of AI principles, ensuring the workforce is equipped with essential knowledge for the AI-driven workplace and connected risks of use of AI at work.

A specialised training for AI team: A targeted live training program supported by a visual mind map for the AI team (with a live attendance of 85% of the Team) has produced the following organisational improvements:

- Understanding of the EU AI Act and its implications by Mural AI Team
- Enhanced risk assessment capabilities, specifically in identifying and **preventing the inclusion in Mural roadmap of high-risk and prohibited AI applications**
- We have established a comprehensive AI inventory system in collaboration with the AI Team. This new system implements standardised AI Use Case Cards for tracking and documenting all AI systems developed by Mural. The framework aligns with international standards and EU recommendations, drawing from the methodology outlined in the paper " I Hupontt, *Use Case Cards: A Use Case Reporting Framework*." This documentation system serves two key purposes: 1) Creates an auditable record of the AI systems developed by Mural; 2) Facilitates effective collaboration between legal professionals and AI developers through structured documentation
- We have completed our first iteration of the AI Use Case Cards that can be reviewed here.

We have also promoted the availability of two weekly office hours hosted by the Legal team where the AI team can join and ask any questions they might have about the EU AI Act.

Which challenges has the practice addressed and what issues is the organisation still facing?

The main **challenge we tried to address is understanding the context-specific nature of AI literacy requirements under the EU AI Act**. The primary challenge we have addressed is the limited operational guidance on AI literacy provided by Article 4 of the AI Act. Since the article doesn't provide specific operational instructions, we developed our own approach based on the principle of proportionality that is referenced multiple times in the Regulation. For this reason, we mandate a general AI literacy training for all staff, while we provided our AI team with a more specialised training.

Is the organisation planning to change and/or improve the practice?

We are actively enhancing our practices through several channels. As members of the EU AI Pact, we regularly try to collaborate with other organisations of the AI Pact through direct meetings to exchange insights and best practices. Our new standardised AI Use Case Cards system has already received positive feedback, as it effectively helps technical and legal/compliance teams to work together in developing responsible and trustworthy AI systems. Looking ahead, we plan to further refine our approach, ensuring our practices remain aligned with regulatory expectations and industry standards.

SAS

On the organisation

Name: **SAS**

Size: Large (250 employees or more)

Headquarter: U.S.A.

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

Type of AI system:

SAS develops, licenses and provides services in support of a suite of AI and analytics software and industry-specific solutions in a variety of settings including on-premises, cloud, or hosted environments. Some of these products may constitute AI systems that can be used in high-risk practices.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff, including all employees. Other persons dealing with the operation or use of the system(s).

The SAS course on "Responsible Innovation and Trustworthy AI" is designed for anyone who wants to gain a deeper understanding about the importance of trust and responsibility in AI, analytics, and innovation. The content is especially geared to those who are making business decisions based on machine learning and AI systems and those who are designing and training AI systems.

Efforts were made to include examples that were relevant and inclusive to **different gender identities, ethnic groups, and people with disabilities**. Scenario examples included non-binary characters, topics relevant to different genders and cultures (for example: racial bias in EEG research, recent efforts to develop female crash test dummies instead of relying on one dummy body type to test for vehicle safety, and racial disparities in automated speech recognition). The course was also tested for accessibility.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The content was authored to be appropriate for **any level of education and technical knowledge**, providing definitions and explanations that aim to be accessible by all. This course can help programmers, executives, advisory board members, testers, managers, or individual contributors gain foundational knowledge and skills to consider the issues related to responsible innovation and trustworthy AI.

How does the practice take into account the context in which the AI system(s) is/are used?

The course provides a variety of **scenarios and examples that explore applications of AI systems across a variety of sectors**, such as healthcare, law enforcement, manufacturing, financial, and technical.

What has been the impact of the practice so far and how does the organisation monitor such impact?

We monitor course usage and **completion statistics, course evaluations, comments from learners, blog views,** and comments. Since the course was launched in 2024, 1,404 unique students enrolled in the self-paced e-learning. Of those, roughly 500 have been SAS employees and the rest are partners, users, academics, and other external parties.

Which challenges has the practice addressed and what issues is the organisation still facing when implementing the practice?

The course addresses the challenge of educating different roles within an organisation with varying degrees of understanding and responsibility related to trustworthy AI development and use. Since the course has been released, we have been continuing efforts to keep it up to date both in terms of AI policy and regulatory developments, but also AI technology progress.

Is the organisation planning to change and/or improve the practice?

We plan to continually update the course as the landscape of AI shifts and morphs over time. We also offer **in-person versions of the course** and gather **feedback from our customers** on **the AI challenges they are facing, using this informal data to shape future update efforts**.

OpenSky Data Systems

On the organisation

Name: OpenSky Data Systems

Size: Medium (50 to 249 employees)

Headquarter: Ireland

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

At OpenSky, we deploy various AI systems utilising Microsoft AI tools to enhance public, health and life sciences sectors operations. The primary purpose of these systems is to improve operational efficiency, facilitate data-driven decision-making, and enhance service delivery to citizens. Key tools we utilise include for example:

- A platform that allows us to build, train, and deploy machine learning models at scale, enabling clients to leverage predictive analytics for informed decision-making.
- A unified data & analytics service helps visualise data and share insights across organisations, allowing public sector clients to make data-driven decisions based on real-time information.

- APIs that enable us to integrate advanced capabilities such as natural language processing and computer vision into applications, enhancing user interactions and automating processes.
- A generative AI tool for technical personnel to enhance coding practices and integrate AI functionalities into their development workflows effectively.

The individuals affected by our AI systems primarily include health, pharma, government employees and stakeholders who rely on these technologies to improve their workflows and decision-making. By deploying these tools, we empower users to automate routine tasks, analyse large datasets, and derive actionable insights that support their roles.

According to our current assessment, none of our deployed AI systems are classified as high-risk under the EU AI Act. We adhere to ethical guidelines and best practices to mitigate any potential risks associated with AI usage. Our commitment to responsible deployment emphasises transparency and accountability while continuously monitoring the performance of these systems to ensure they meet client needs effectively.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

At OpenSky, our AI literacy practice targets **all employees within the organisation**, ensuring that everyone, regardless of their role, is equipped with essential knowledge about artificial intelligence.

We provide **tailored training programs for technical staff**, focusing on the integration of AI into coding and software development.

Non-technical employees also receive training on using AI tools effectively, such as data visualisation and leveraging AI for improved communication. By fostering a comprehensive understanding of AI across all levels, we empower our workforce to utilise these technologies confidently and responsibly.

In addition to our internal training initiatives, we extend our AI literacy efforts to our **clients,** particularly in the public, health, and pharma sector. We conduct **workshops and training sessions** that educate clients on the relevance and application of AI technologies in their operations. This includes demonstrating how AI tools can enhance service delivery and operational efficiency. Our goal is to ensure that both public and private sector clients understand the potential of AI to transform their workflows, enabling them to make informed decisions about integrating these technologies into their practices. By providing this education, we help our clients navigate the complexities of AI implementation while promoting responsible use. Additionally, we emphasise the importance of understanding potential risks, such as biases in data, limitations in AI decision-making, and the need for robust data privacy and security measures to mitigate concerns and ensure ethical deployment.

At OpenSky, we prioritise diversity and inclusivity in our AI literacy initiatives. Our training programs are designed to be **accessible to all employees**, regardless of gender identity, race, or ethnicity. We actively ensure that our educational content is free from biases and is tailored to accommodate individuals from various backgrounds, fostering an environment where everyone can thrive and contribute to our AI initiatives.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Our AI literacy practice is structured to accommodate **varying levels of technical knowledge** among our employees. For technical staff, we provide in-depth training on AI integration within coding practices and software development. For non-technical employees, we offer workshops that simplify complex concepts and focus on practical applications of AI tools. This tailored approach ensures that all employees can engage meaningfully with AI technologies relevant to their roles.

We are committed to inclusivity in all our training programs. Our materials are designed to be accessible to individuals from diverse backgrounds, including those with varying levels of technical expertise. We provide foundational training for non-technical staff while offering advanced sessions for technical personnel to deepen their understanding of AI integration into coding practices. To continually improve our practice, we implement **feedback mechanisms** that allow participants to share their experiences and suggest areas for enhancement. This feedback is crucial for adapting our training content to meet evolving client needs effectively.

How does the practice take into account the context in which the AI system(s) is/are used?

At OpenSky, our AI literacy practice is designed with careful consideration of the context in which our AI systems are deployed, particularly within the public, health and pharma sectors. We recognise that the application of AI technologies varies significantly across different sectors and use cases, which necessitates a tailored approach to education and training. Our primary focus for public sector is on educating government employees and public administrators on how AI can enhance citizen service delivery and operational efficiency. We conduct **workshops that address specific challenges faced by public sector organisations**, such as improving citizen engagement, optimising resource allocation, and ensuring compliance with regulatory standards.

By **aligning our training with the unique needs of this sector**, we ensure that participants can directly apply their learning to **real-world scenarios**. The training sessions emphasise practical applications of AI tools. For health and pharma sectors, our focus is on using data and augmented analytics to drive real-time decision-making, we **demonstrate how these tools can be used to analyse data** for informed decision-making or automate processes to save time and resources. This hands-on approach helps participants understand not only the theoretical aspects of AI but also its practical implications in their daily work.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The impact of our AI literacy initiatives at OpenSky has been significant both qualitatively and quantitatively. We have established **key performance indicators** (KPIs) to measure program effectiveness, including participation rates in training sessions, user engagement with AI tools, and client satisfaction levels. Over the past year, we have observed a **30% increase in employee participation in AI training sessions**, indicating a growing interest in AI literacy within our workforce. Additionally, there has been a **65% increase in usage of specific AI tools** among employees, reflecting enhanced confidence in utilising these technologies in their daily tasks. Client feedback surveys reveal that **85% of participants found our training sessions helpful** in understanding relevant AI applications.

Qualitatively, our practice has fostered a **culture of innovation** within OpenSky. Employees report feeling empowered to explore AI solutions and integrate them into workflows leading to increased creativity in problem-solving and a proactive approach towards leveraging AI for efficiency.

To monitor impacts effectively, we implement regular **feedback loops through post-training surveys** followed by **interviews with participants**, allowing us to identify areas needing improvement while adapting training content better suited for both employees' needs as well as those of clients.

Which challenges has the practice addressed and what issues is the organisation still facing?

OpenSky's AI literacy practice has effectively addressed significant challenges, particularly regarding knowledge gaps among employees and clients about integrating new technologies into operations; many initially lacked clear understanding, which led us to successfully bridge this gap, resulting in **increased confidence in using available resources effectively**. Additionally, we have tackled **resistance to change** among some hesitant to adopt new approaches; through targeted education and hands-on workshops, we have demonstrated how it serves as a supportive tool rather than a replacement, fostering innovation culture across the organisation.

Despite successes, **ongoing challenges include ensuring consistent engagement of departments** due to variability interest levels leading to uneven participation; exploring tailored content addressing specific needs emphasising real-world applications remains a priority moving forward while actively seeking feedback, adapting approaches aims to overcome challenges and enhancing effective initiatives overall.

In addition, there has been **reluctance for some clients to move forward with AI initiatives due to increased data breach concerns and inability to manage AI decision-making**. Through structured development and deployment processes including client staff training, we provide the tools and knowledge necessary to monitor and audit all AI decisions, provide the transparency needed to give clients confidence that their deployed AI solutions are not biased and that all aspects can be adequately monitored and controlled.

Is the organisation planning to change and/or improve the practice?

OpenSky is committed to continuously enhancing our literacy practices, ensuring they remain relevant and effective. We are actively planning several improvements based on participant feedback and emerging technology trends. One key area focus is developing specialised modules addressing specific departmental needs, tailoring content to unique challenges faced by each team. Additionally, we aim to incorporate **more interactive sessions** through hands-on workshops and real-world case studies, fostering deeper engagement and practical understanding of applications involved.

We also plan closer **collabouration with external experts** and organisations like CeADAR and The Alan Turing Institute to enrich educational offerings and stay up to date on AI literacy practices. Furthermore, we implement a **mentorship program** where experienced employees guide peers in applying AI effectively, ensuring continuous learning and empowering the workforce to navigate the fast-evolving landscape of artificial intelligence with confidence.

Overall, the strategy implementation reflects a commitment to ongoing development and growth within the organisation, as well as the clients it serves. This approach ensures high standards of quality education are maintained throughout the process. Every step forward is undertaken collaboratively, with the aim of achieving mutually beneficial goals. Success is ultimately measured by reaching desired outcomes through joint efforts and a shared vision. Together, we work harmoniously toward a brighter tomorrow, building on the possibilities envisioned today.

TELEFÓNICA S.A.

On the organisation

Name: **TELEFÓNICA S.A.**

Size: Large (250 employees or more)

Headquarter: Spain

Sector: ICT

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Telefónica leverages AI systems across various domains to enhance operations, improve customer experiences, and drive innovation. These systems are deployed in customer service, network management, fraud detection, and personalised content delivery, affecting millions of users, employees, and communities. Telefónica prioritises ethical and responsible AI practices and governance models to ensure compliance, transparency, and accountability.

AI systems deployed are used for:

- Customer service optimisation:
  - Aura: Telefónica's AI-powered virtual assistant offers personalised support, helping customers manage services, troubleshoot issues, and resolve queries efficiently using natural language processing (NLP).
  - Chatbots and Voicebots: These systems automate repetitive tasks, deliver 24/7 assistance, and reduce response times, enhancing user satisfaction.
- Network management and operations:
  - Cognitive Networks: AI-driven systems monitor and optimise network performance in real time, preventing disruptions and ensuring seamless connectivity.
  - Fraud Detection: Machine learning algorithms identify and mitigate fraudulent activities, safeguarding customer data and financial transactions.
- Personalised recommendations:
  - AI models analyse user behaviours to suggest tailored content, including streaming services, offers, and promotions, enriching the customer experience.
- Internal efficiency:
  - AI automates operational processes like billing and supply chain management, improving efficiency and cost-effectiveness.

The following groups of people are impacted by our deployed AI systems:

- Customers: AI systems enhance user experiences through personalised interactions, reliable connectivity, and secure transactions.
- Employees: Automation reduces repetitive tasks, allowing staff to focus on strategic activities and improving productivity.
- Communities: Initiatives such as smart city projects and digital inclusion programs benefit from AI-driven insights.

Telefónica applies an AI Act and Responsible AI (RAI) perspective whereby we operate by registering and analysing the risks of the company's AI use cases. Along the way, we have not come across a large number of high-risk cases, but we have encountered some that qualified as such. Adhering to our AI Principles, and with the purpose of setting good practice, after identifying the risks associated to these high-risk use cases, we recommended appropriate mitigating measures, such as suggesting the possibility of human intervention, increased monitoring, and more rigorous and thorough documentation. In this way, we were able to deploy these use cases in the market, complying with our internal code of conduct and anticipating to the requirements that the AI Act will ask.

Telefónica implements robust governance frameworks to ensure responsible AI use:

- Transparency and explainability: Systems provide clear outputs to foster user trust.
- Data Privacy: Compliance with GDPR and similar regulations ensures strong data protection measures.
- Fairness and Inclusivity: Algorithms undergo regular audits to identify and eliminate biases.
- Accountability: Mechanisms are in place to address grievances and ensure ethical decision-making.

Telefónica's AI systems aim to optimise operations, improve customer experiences, and support societal advancements while adhering to ethical principles and implementing a robust governance model. Through its commitment to transparency, privacy, and fairness, Telefónica ensures its AI-driven innovations align with regulatory standards and user trust, addressing risks and maximising positive impacts.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

Our RAI Culture Plan is intimately linked to our AI Code of Conduct, which includes the principles of human-centred, fair and inclusive AI. We also apply this approach when constituting roles for our RAI governance, such as our AI Ethics Group of Experts that caters to diversity in terms of gender, age, geography and professional status.

Telefónica also focuses on ensuring a diverse workforce and a Responsible Design approach that promotes accessibility and inclusiveness. Our AI Literacy path tries to reach out to the whole of society, mainly **vulnerable groups such as older generations or lower income households**. In this regard, we promote initiatives such as the Digital Skills Training Program of Conecta Empleo, the Employment Map, the Virtual Career Advisor and Campus 42. All these programs count on friendly interfaces, they are open and free of charge and have no age limit, nor do they require prior training.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

As for the organisation's staff, our ***AI for All*** program considers the difference in knowledge and experience by focusing on **different profiles** (for the bulk of employees, for executives, for Gen AI users and for technical teams such as developers, data scientists through our RAI Champions). We also employ **different styles of learning**: hands-on learning, raising awareness for AI opportunities and Gen AI Tools.

We believe **AI Literacy cannot be separated from Responsible AI (RAI) Literacy**. On that logic, our Telefónica's RAI Culture Plan aims to develop awareness by deploying a capillarity that permeates all

business areas, considering the variety of profiles. Thus, we have done training focused on business, management, communication and legal areas, as well as specialised technical training for AI developers. We also count on a specific certification for RAI Champions, a role designated by our RAI Governance that acts as an intermediary with the business areas to ensure responsible and ethical use and development of AI.

With respect to **other persons** dealing with the operation or use of the system(s) (such as customers and communities), the **Digital Skills Training Program of Conecta Empleo** takes into account the different levels of technical knowledge and experience by offering a great **variety of courses** in areas such as cybersecurity, competences for the professional life, design and development of digital products, programming & software development and **AI & Big Data.**

In the case of the **Employment map,** the platform analyses the labour supply and provides a clear overview of the most sought-after digital professions, so it proves to be a useful tool to anyone regardless of their technical knowledge or experience.

The **Virtual Career Advisor** also considers the different levels of digital skills, as its chatbot suggests the most appropriate online training on offer tailored to the level and need of each user, in line with the demands of the job market.

Lastly, as mentioned, ***Campus 42*** trains in the most sought-after profiles and has no age limit and no prior training required.

How does the practice take into account the context in which the AI system(s) is/are used?

At Telefónica we use AI for several applications. We apply it in our B2B business and in customer service to improve our relationship with our customers. We also work with it to optimise our internal processes and in our employees' day-to-day work. Consequently, also regarding our RAI culture plan, we **tailor our training courses to the different uses of AI in the company**. Likewise, we also conduct specific training, workshops, and awareness sessions according to the area: market services to third parties (T. Tech), digitalisation, legal, comms, customer service, etc.

What has been the impact of the practice so far and how does the organisation monitor such impact?

For the activities related to the organisation's staff, as part of Telefónica's RAI Culture Plan, we have conducted **more than 43 general training and awareness sessions**, with more than **2000 attendees impacted**. We have also held more than **100 meetings with the RAI Champions**. In the "Introduction to Generative and Responsible AI" course taught at our corporate university, UNIVERSITAS, we managed to impact more than 1200 employees in 2 sessions. In addition, we have 2 responsible AI usage guides: one for business areas and another on day-to-day use of generative AI for employees.

In terms of monitoring the impact of our practices, training sessions aimed at the bulk of employees are recorded in **success factors** (e.g. our course "Introduction to Generative AI and Responsible AI"). On the other hand, RAI Governance also provides mechanisms to **follow up** on the areas trained (193 follow-up meeting with business areas), such as having designated **roles that act as intermediaries** (RAI champions).

For what concerns other persons dealing with the operation or use of the system(s), data shows that the Digital Skills Training Program of Conecta Empleo helped **close to 300,000 people** from **9 countries** to improve their digital skills in 2022. On the other hand, Campus 42 has reached **more than 1500 candidates** for the pools.

In summary, our efforts to implement good practices and achieve a Responsible and Compliant AI result in promoting AI literacy inside and outside the company, helping to generate a necessary cultural change and generating an ethical awareness that translates into a responsible design, development and commercialisation of AI products.

Which challenges has the practice addressed and what issues is the organisation still facing?

One of the most notable challenges we have encountered is the **lack of awareness about the potential impacts of AI,** such as risks of transparency or explainability, in the context of AI literacy. This also combined with the lack of references due to the novelty of AI.

By promoting AI Literacy, we found ourselves on the right track to overcome the lack of risk awareness. This awareness of the impact cannot be detached from an ethical sensibility, which is why the promoting of AI literacy must be inseparable from RAI Literacy.

Is the organisation planning to change and/or improve the practice?

We believe we are on the right track to **re**duce the AI divide and increase AI Literacy. Our goals are set on improving our practice and **reaching out to more employees, with more materials and specific guidelines regarding the different types of AI systems** and their potential impacts. We also want to work on the **standardisation and specialisation of training**, considering too the possible variety of AI use cases.

Workday

On the organisation

Name: **Workday**

Size: Large (250 employees or more)

Headquarter: U.S.

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Workday has multiple AI features and use cases across human capital management (HCM), finance, and Student Information Software. Workday employees, our customers' employees, and other end users of our software are affected by our AI systems.

The majority of Workday's AI systems are not assessed as high-risk. However, we anticipate that a selected list of features will be categorised as high-risk AI.

On the AI literacy approach

Status: Fully implemented

Target group: Organisation's staff

All Workday employees are required to be trained on AI and our responsible AI (RAI) practices as part of our annual code of conduct training. **Personnel directly involved in developing AI**, such as product managers and AI/ML engineers, are required to undergo further training. Workday also supplies optional 3rd-party training libraries to its employees.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Where **AI literacy training is designed for every Workday employee**, it is more general and oriented to corporate policies, procedures, ethics, trust, and corporate responsibility-related expectations.

For employees who engage externally on AI, **specialised training suited to this role** is provided.
For target audiences responsible for developing, providing, and/or deploying AI, **AI literacy is tailored to their more technical roles** and responsibilities. For example, Workday provides specialised training for employees who regularly engage customers and prospects on AI systems and technologies, which is different from the more technical training provided to teams developing AI features such as product managers, UX designers, and AI/ML engineers.

How does the practice take into account the context in which the AI system(s) is/are used?

We understand that **AI use cases require different levels of guidance and literacy**, influenced by factors like their risk profile or fit in the market. That is why we develop **contextualised responsible AI guidelines and support materials** pertaining to each AI use case description and its intended function, as needs might differ from human capital management or finance applications. This method ensures that each use case receives the necessary guidance and literacy to enable its adherence to our responsible AI quality standards.

Moreover, to ensure focused support, **we incorporate AI literacy resources within the flow of our product development lifecycle**. Our product lifecycle incorporates stage gates in which we embed on-the-job guidance and job aids when the tasks become relevant for AI development. This reinforces ideal behaviours within existing processes and workflows for our development teams, keeping them focused on context-specific guidance.

This operations-focused practice gives us two advantages in the AI literacy space:

1. The flexibility to surface crucial role-and context-specific guidance on responsible AI practices.
2. Demonstrable proficiency and comprehension of those practices based on how the teams develop/deploy their AI use cases against the guidance.

What has been the impact of the practice so far and how does the organisation monitor such impact?

Concerning Workday's practices incorporating AI literacy resources within the product development lifecycle, Workday product teams share **documentation on how each practice is met** within our standardised and systematised evaluation and attestation process. This provides a form of documentation for how the AI practices are being met, and to what standard of quality.

In addition, these practices are contextualised within broader areas of impact viewed in **qualitative and quantitative measures**, including:

Qualitative Impact

- Cross-functional teams e.g. product operations, have reported that the inclusion of AI literacy resources into the product development lifecycle has resulted in:
    - Enhanced consideration of ethical implications and societal impacts of AI.
    - Increased awareness and understanding of responsible AI risk mitigations.
    - The feeling that we are speeding up their work while improving the quality of their products.

Quantitative Impact

- All verified AI use cases that have gone through the development process have demonstrated adherence to responsible AI quality standards and corresponding risk mitigations.

Development teams actively test and monitor the performance of AI systems that have gone through the process, and the results inform enhancements to AI literacy resources. This **continuous feedback loop** by development teams takes place in close collaboration with Workday's Responsible AI team.

Which challenges has the practice addressed and what issues is the organisation still facing?

This approach is successful in the near-term and long-term, as it enables employees to easily incorporate AI literacy into their critical role in developing and maintaining safe AI systems. **Our workmates/users can move efficiently and effectively through an analysis** process that could otherwise be cumbersome and delay innovation. Moreover, embedding task-specific AI literacy to support our workflows will improve metrics such as feature velocity, customer satisfaction, and product uptime.

The challenge with any learning solution is to **measure to what degree the materials improved the performance metrics**. Relying on knowledge assessments is only applicable to certain tasks as an indicator of success, and can be an unreliable scientific measure of training effectiveness if not properly contextualised. This is especially challenging in the rapidly evolving world of AI development, where novel use cases bring up scenarios that did not previously exist. As a result, we're exploring approaches to accurately connect our solutions to clearly measurable outcomes.

Is the organisation planning to change and/or improve the practice?

We see an opportunity for the practice to enable **increased internal transparency** around cross-functional use cases. Multiple internal stakeholders have a vested interest in the AI development lifecycle but only receive information during certain phases of the lifecycle rather than throughout. We are exploring ways to make **essential use case information** available in a way that is efficient and effective. Doing so will serve multiple goals, including better quality decision-making for cross functional teams.

II. Partially rolled-out practices

Anekanta AI

On the organisation

Name: **Anekanta AI**

Size: Micro (1 to 15 employees)

Headquarter: United Kingdom

Sector: Several sectors, including security and biometrics domains

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

We deploy a range of machine learning and GenAI based risk assessment tools developed in-house which assist our internal teams in evaluating a range of AI risks dependent upon the use case and jurisdiction of the deployment. In the future, these AI systems, which form a portion of our product and services portfolio, will be provided to our larger clients under commercial agreements to help them make continuing AI risk and compliance decisions as part of a wider cross-functional AI governance effort.

The purpose of the AI systems is to increase the effectiveness of the high-level triage of AI risk prior to our deep dive assessments which assess pre-development strategies, development road maps and deployment plans. The people affected by our AI systems are employees and officers of commercial entities making decisions about the development and deployment of AI systems. These may in turn affect health, safety, and fundamental rights as defined in the EU AI Act.

According to our current assessment, our AI systems are not high-risk, but we evaluate high-risk systems and recommend mitigations which reduce the effects on the health, safety and fundamental rights that are protected by Union law. Our recommendations are considered by the decision bodies of organisations. These bodies also recognise they need to guide their teams towards the best possible practices to exploit AI opportunities and reduce risk, through transparency, human oversight, and AI literacy.

On the AI literacy approach

Status: Partially rolled-out

Target group: **Organisation's staff**, including research analysts, AI risk assessment specialists, and industry sector/domain experts; **Other persons** dealing with the operation or use of the system(s), including client stakeholders and decision body members.

We accommodate all gender identities, ethnic groups, and people with disabilities within our inclusive company policies. The AI systems are designed with accessibility in mind and therefore accommodate affected groups through the interface design and planned multimodal outputs.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

We maintain an **up-to-date skills matrix** for our team members to ensure we have a good understanding of their training needs relative to our product developments. For **new team members** and other stakeholders, we gather relevant information about their AI literacy with their free and informed consent.

We also provide **training to ensure a clear understanding of how our AI systems make decisions** and which part of the software contains AI for transparency. Furthermore, **we train our team to interpret the outputs** of the AI systems by helping them to understand a good or bad output, additionally helping them to develop their **critical thinking skills** and confidence to challenge the AI decisions. We also develop in-house and external training programmes **for specific AI technology use cases** which are appropriate to the risk evaluations we undertake.

We **regularly assess the skills and competencies of our team** and others and adjust the training programmes as appropriate to the technical knowledge, education, experience of our target groups.

How does the practice take into account the context in which the AI system(s) is/are used?

We **assess AI system context use cases** and purpose as part of our product and services portfolio in addition to using AI systems within our organisation.

- **For external client use cases**, we assess the training needs of our team relative to the AI system and its use case and in response, develop or seek the training materials from the AI system provider we are evaluating.

- **For our in-house use cases,** we have created an AI strategy which is underpinned by AI policy which sets the context of the use of AI systems within our business. We have completed steps towards the **AI Management System Standard ISO/IEC 42001**, although we appreciate this does not result in a presumption of conformity, we know that it sets out good practice and responsible AI management including an implication that staff should be competent to implement and manage AI systems.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The practice has had a positive impact on the successful use of our AI systems in turn reducing the need to re-map decisions manually by over 50% whilst increasing the accuracy of our high-level triage decisions by the same measure.

The impacts are evident in the accuracy of our outputs therefore it is possible to **monitor the impact through the process of skilled and experienced human oversight review** prior to the release of our assessments.

Which challenges has the practice addressed and what issues is the organisation still facing?

The practice has helped address the challenge of **consistent interpretation of our AI system's high-level triage outputs** which has in turn informed the development road map and product specification. The accuracy of GenAI must be continually monitored transparently, within a business culture which promotes trust to ensure that we capture any challenges with the use of the technology. We address inaccuracy issues through the **critical thinking skills** of our teams in an environment of psychological safety which allows our teams to admit their errors in the use of the system with impunity which in turn encourages a healthy debate about system performance. Furthermore, our **external AI literacy practices** require reflective review of the learnings to put them into practice, and **dependent upon the scope of engagement we review the literacy needs and update the programme** on a regular basis to accommodate emerging technologies which are not yet in production within an organisation.

A challenge is **keeping up with the pace of GPAI changes** and evaluating which changes are relevant to industrial use cases.

Is the organisation planning to change and/or improve the practice?

We **continually review** and improve our systems based on our **user's feedback.** The changes are iterative and mostly immediate.

BiMeta Corporation

On the organisation

Name: **BIMeta Corporation**

Size: Micro (1 to 15 employees)

Headquarter: U.S.A.

Sector: Architecture, Engineering and Construction (AEC)

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Building Information Modeling (BIM) benefits from AI-powered clash detection, automatic updates, and data synchronisation. AI optimises construction management by predicting delays, automating scheduling, monitoring progress with drones, and improving cost estimation accuracy. Safety is bolstered through AI systems that identify hazards and forecast maintenance needs. For energy efficiency, AI enables advanced energy modelling, sustainable material selection, and IoT integration for smart building automation. Quality control processes use AI for defect detection and compliance checks, while urban planning leverages AI for site analysis, traffic modelling, and infrastructure optimisation.

On the AI literacy approach

Status: Partially rolled-out

Target group: Other persons dealing with the operation or use of the system(s), including include the **security team**, and **customers** utilising visualisation tools.

We will have people practice with the AI Tools to see the end results and whether the results match the expectations of the AI model.

The practice accounts are not specific to any gender or identity information but rather people within the field itself. **Demographics** may be utilised later to determine who uses the AI tools and does not.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The practice considers the **varying levels** of technical knowledge, experience, and education among the target group by implementing **tiered training programs**. These include introductory sessions for

beginners, advanced workshops for experienced professionals, and ongoing refresher courses for all levels. Training materials are tailored to reflect **real-world use cases relevant to the AEC industry**, ensuring practical applicability.

How does the practice take into account the context in which the AI system(s) is/are used?

The practice is designed to align closely with the **specific needs and objectives of the Architecture, Engineering, and Construction (AEC) sector.** For instance, AI systems for BIM and construction management are introduced with a focus on improving project efficiency, safety, and sustainability. Training emphasises the use of AI for tasks such as clash detection, energy modelling, and progress monitoring, ensuring participants understand its relevance to their roles.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The impact of the practice is measured through both qualitative and quantitative KPIs. Qualitatively, **feedback** from participants indicates increased confidence and proficiency in using AI tools, as well as improved understanding of AI's role in project workflows. Quantitatively, key metrics include reduced project delays, fewer errors detected during clash detection, and improved energy efficiency modelling accuracy. These **metrics** are monitored using performance dashboards, surveys, and reports generated from AI system usage. **Regular evaluations** ensure the practice remains effective and adapts to evolving needs.

Which challenges has the practice addressed and what issues is the organisation still facing?

The practice has helped address challenges such as **resistance to adopting new technology and the steep learning curve associated with AI tools.** By providing hands-on training and demonstrating the practical benefits of AI, participants are more open to integrating these tools into their workflows.

However, challenges remain, such as **ensuring consistent access to AI resources** and **overcoming initial scepticism from stakeholders about the reliability of AI predictions.** Continuous refinement of training methods and additional outreach efforts are planned to address these issues.

Is the organisation planning to change and/or improve the practice?

The organisation plans to enhance the practice by incorporating **more immersive training methods,** such as **virtual reality (VR) simulations**, to provide participants with realistic, hands-on experience. Additionally, a **mentorship program** is being considered to pair experienced AI users with beginners for personalised guidance. **Feedback loops** will be strengthened through frequent surveys and workshops to ensure the practice evolves to meet the changing needs of the sector. Plans also include **expanding training** to cover emerging AI applications and integrating cross-disciplinary collaboration opportunities.

Collibra B.V.

On the organisation

Name: **Collibra B.V.**

Size: Large (250 employees or more)

Headquarter: The Netherlands

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Collibra has developed a number of AI powered tools within its suite of product offerings. A complete list of those tools is available here. Most of these tools involve leveraging an enterprise LLM, such as *Google Vertex*, to enable customers to perform a specific function within the *Collibra platform*. Examples include using an LLM to generate descriptions of assets or perform a semantic search. Collibra has robust contracts and data processing addenda with the providers of all LLM tools within our product, preserving the confidentiality, security, privacy, and intellectual property rights of our users. According to our current assessments, none of these use cases are high risk or would be considered general-purpose AI tools, given their narrow focus. That said, Collibra is actively working on ensuring that all users of these products are aware they are engaging with an AI system for full transparency.

Collibra also consumes AI tools through standard, commercially available third-party products, such as *Workday* and *Salesforce*. While these tools may be leveraged to aid in business decisions and may process some personal data, there is a significant amount of human oversight and verification involved with all of these systems, thereby mitigating the risk. Further, these vendors are subject to Collibra's mandatory confidentiality, security, privacy, and intellectual property rights requirements. Collibra does not use these AI tools to make material decisions that could impact the wellbeing of individuals or result in bias towards individuals.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff, i.e., **all employees, with additional training for engineering and security professionals** involved in the development, deployment, monitoring, and testing of AI systems. Bias against particular individuals is identified in our training as a risk to be aware of.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

In addition to the **standard literacy training on the risks associated with AI use, including risks related to confidentiality, security, data privacy, intellectual property, fundamental rights, ethics and bias** provided to all employees, Collibra has created a **large volume of stress testing guidance for AI engineering and security professionals** that provides significant details on the safe development, deployment, and monitoring of AI solutions.

How does the practice take into account the context in which the AI system(s) is/are used?

Collibra provides all employees with **guidance as to how to determine risks in the use of AI systems.** This guidance takes into account:

a) the type of data involved (e.g., personal data, customer data, and financial data),
b) whether the use involves material business decisions or decisions that could have a material impact on individuals, including employees,
c) the sophistication of the user,
d) the amount of human oversight involved in the AI system, and
e) the protocols in place to avoid abuse of the system.

Where the risk reaches a material threshold, employees are trained that the AI system must be reviewed and approved by **Collibra's legal team.**

What has been the impact of the practice so far and how does the organisation monitor such impact?

Our employees have now a **solid understanding** of how to triage their deployment of an AI use case and where to go if a legal review of the use case is warranted. Our efforts to document all material use cases across the organisation have been strengthened due to the AI literacy training, and we now have a healthy inventory of fully assessed, documented, and monitored AI use cases. This has helped us ensure that our use of AI within our organisation fits within the growing global regulatory frameworks. As a result, we have obtained an **ISO 42001 AI Governance certification**.

Which challenges has the practice addressed and what issues is the organisation still facing?

While we have provided all employees with a clear path to assessing risks in their use of AI, **employees often do not understand when they are interacting with AI features in existing third-party software**. Those features are often incorporated into third party platforms without Collibra's knowledge. We rely on employees to identify those use cases and triage them for risk and whether legal review is required. Training has helped with this, but we still have work to do.

Is the organisation planning to change and/or improve the practice?

We are rolling out more **video training modules** in addition to the existing available content as to how to identify risks in the deployment of AI systems.

Credo AI

On the organisation

Name: **Credo AI**

Size: Medium (50 to 250 employees)

Headquarter: U.S.A.

Sector: Software development

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

The Credo AI Responsible AI Governance Platform streamlines and standardises AI governance by enabling organisations to assess, monitor, and document AI risks related to fairness, transparency, security, and compliance. Credo AI ensures enterprises in finance, HR, healthcare, insurance, and other sectors can efficiently meet regulatory requirements like the EU AI Act while mitigating AI risks. Ultimately, Credo AI enables organisations to scale AI governance effectively, ensure compliance, and align AI risks with business objectives without slowing down innovation.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s), i.e., all staff both within Credo AI and/or the organisations Credo AI works with.

Inclusiveness is a fundamental principle embedded in Credo AI's approach. The organisation recognises that building AI literacy must account for the **diverse** backgrounds, identities, and experiences of stakeholders, including different gender identities, ethnic groups, and people with disabilities. The content within the AI Governance Academy and related initiatives includes examples, case studies, and real-world scenarios that aim to address this. Including discussions about fairness, accountability, and equity as part of the AI Literacy offering helps to ensure these issues are not only theoretical but grounded in understanding how AI can disproportionately affect different groups. Credo AI's literacy programs offer multiple learning formats designed to accommodate **diverse learning needs.** Feedback loops are integrated to continuously improve accessibility features and ensure that the learning experience is inclusive for participants.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Credo AI's practice of advancing AI literacy is designed with a deep understanding of the diverse technical knowledge, experience, education, and training levels of its target groups. The organisation's tailored, role-specific approach ensures that each program is aligned with the unique needs and responsibilities of stakeholders across different sectors, recognising the varying levels of AI governance maturity and pre-existing AI expertise. For example**, foundational modules** in the AI Governance Academy provide accessible content for **non-technical roles** such as policymakers and legal teams, focusing on the ethical, legal, and societal implications of AI. Meanwhile, more **advanced modules cater to technical audiences** like data scientists, developers, and compliance officers, offering in-depth insights into AI risk

management, governance workflows, and regulatory standards. The program is designed to help cross-pollinate knowledge across these various fields and build comprehensive, organisation-wide AI literacy.

Credo AI's approach includes **an initial assessment of participants' literacy levels** to identify knowledge gaps and customise the training content accordingly. By blending **sector-specific case studies and interactive learning tools**, such as real-world simulations and scenario-based exercises, the program aims to bridge the gap between theoretical knowledge and practical application. Additionally, **continuous learning** components ensure that participants remain up to date with rapid advancements in AI technologies and evolving regulatory requirements.

The integration of flexible formats—ranging from **self-paced digital modules to in-person workshops**—allows for accessibility regardless of prior experience or education level. This ensures that both highly specialised professionals and general stakeholders can engage with content that is relevant, digestible, and impactful. By addressing varying levels of expertise and providing ongoing support, Credo AI's program empowers individuals to build confidence and competence in responsibly managing and deploying AI systems.

How does the practice take into account the context in which the AI system(s) is/are used?

Credo AI's approach to AI literacy is deeply embedded in its broader AI governance framework, ensuring that AI literacy efforts are context-driven, scalable, and actionable. Credo AI has deployed an **enterprise-wide AI governance literacy program** for all employees, consisting of a living repository of video tutorials on AI policies, capabilities, and applications, as well as FAQs, and structured learning materials, combined with biannual in-person training programs offered by Credo AI staff.

The **diverse format** of educational materials is intended to accommodate **different learning styles**, **various roles** in the organisation, as well as **varying degrees and fields of expertise** across employees. AI Literacy training is also a mandatory element of new employee onboarding at Credo AI. This ensures that AI literacy remains a core part of daily operations across the enterprise, reinforcing a shared understanding of AI risks, ethical considerations, and compliance responsibilities. Additionally, individual Team "Wikis" within an internal tool (Slack) point all employees to resources which explain each team's priorities, including how they are using AI to achieve these priorities (sharing best practices and various AI tools to increase understanding and adoption).

Credo AI takes a structured and modular approach that adapts to the specific **operational and regulatory context** of both its employees and its customers.

- **Embedding AI Literacy in Daily AI Governance Workflows:** Through newsletters, micro-learning modules, and interactive AI bootcamps, employees and clients remain continuously informed about evolving risks, regulatory updates, and best practices. In addition to these assets, the Credo AI platform itself acts as a literacy enabler to enterprises, providing oversight across different stakeholder groups and internal enterprise teams.
- **AI Literacy Connectors and Continuous Governance Integration:** Internally, Credo AI staff immersed in issues related to AI literacy developments worldwide act as internal guides. These internal guides:
    - Monitor regulatory developments and continuously update AI literacy materials to reflect evolving compliance and technological advancements; and,
    - Provide guidance to technical and non-technical teams on applying AI literacy principles within specific operational contexts (to use cases).
- **Context-Aware AI Literacy Training Across Maturity Stages:** Credo AI's Advisory program (which all Credo AI employees also undertake upon joining the organisation), provides literacy training to

other organisations at varying levels of enterprise maturity. Training is tailored to non-technical stakeholders (e.g., legal, HR, compliance teams), technical teams (e.g., data scientists, engineers), and executive leadership and governance officers.

The structured learning approach includes a digital knowledge base, interactive learning modules, and in-person AI literacy training offerings to ensure that AI governance principles are understood and applied effectively at the enterprise level. AI literacy is a dynamic process, not a one-time effort. Credo AI also ensures continuous improvement of its AI literacy initiatives through employee and client feedback loops to refine training materials based on practical AI deployment challenges.

What has been the impact of the practice so far and how does the organisation monitor such impact?

With the programs still in the early stages of deployment and refinement, Credo AI is committed to establishing a robust monitoring and evaluation framework to measure the effectiveness of our initiatives over time. Our approach includes **developing key performance indicators** (KPIs) that will assess both learning outcomes and behavioural changes, such as participants' knowledge retention, application of governance principles in workflows, and readiness to navigate regulatory requirements. This could be implemented in formats akin to **pre- and post-assessment surveys** for program participants, tracking metrics such as program participation rates, feedback quality, and engagement levels across different sectors and roles.

By continuously gathering data and **feedback**, we aim to iteratively refine our literacy offerings to ensure they remain relevant and impactful. This process will also help us identify best practices and areas for improvement, reinforcing our commitment to responsible AI adoption at scale. Ultimately, this framework will ensure that our AI literacy programs not only support compliance, but also foster meaningful cultural shifts toward responsible AI governance.

Which challenges has the practice addressed and what issues is the organisation still facing when implementing the practice?

AI literacy initiatives consistently grapple with common challenges, stemming from the rapid evolution of AI, varying levels of employee expertise, and the necessity to balance innovation with ethical and legal obligations. A major issue is the **foundational AI knowledge deficit**, particularly among non-technical teams. This is often addressed through tiered learning models, multimodal content delivery, and role-specific training. However, as AI continues to evolve, one-off training programs fail to keep employees adequately informed. Credo AI counteracts this by integrating **annual updates, real-world case studies, and iterative learning assessments** to ensure relevance. Sector-specific AI training is also crucial. Generic programs often fail to resonate with industry needs.

The **divergence of AI applications** across industries makes tailored training an imperative rather than an option. The rise of regional and market-specific AI governance frameworks further complicates the landscape, requiring employees to develop an awareness of compliance risks, bias mitigation, and ethical concerns. Integrating AI risk assessments into training and ensuring employees understand regulatory obligations will be critical in addressing this challenge. In our experience, the most effective AI literacy programs incorporate adaptive, tiered learning structures, industry-specific use cases and a cross-functional approach. Continuous iteration, interactive training methods, and an emphasis on responsible AI governance are essential to sustaining engagement and ensuring that AI literacy efforts remain relevant in an ever-evolving technological and regulatory landscape.

Is the organisation planning to change and/or improve the practice?

Credo AI continuously evaluates and improves its practices to account for new technological advancements, learnings from enterprise development and deployment of AI in various contexts, as well as regulatory developments in the AI policy landscape. As part of this commitment, the organisation plans to enhance its AI literacy initiatives by **expanding its role-specific training modules** to cover new regulatory frameworks and technological innovations, including generative AI and sector-specific AI use cases. This includes developing more dynamic and interactive learning tools, such as **scenario-based simulations and advanced gamified modules**, to deepen engagement and critical thinking.

Credo AI is also investing **in expanding its monitoring and feedback** mechanisms to provide real-time insights into program effectiveness. Additionally, the ongoing integration of stakeholder feedback helps refine these programs, making them more adaptive to both regulatory changes and evolving market needs. Finally, by maintaining, reinforcing, and expanding partnerships with regulators, industry, and civil society, Credo AI aims to ensure that our offerings remain not only relevant but also instrumental in fostering responsible AI adoption on a global scale.

Dedalus Healthcare

On the organisation

Name: **Dedalus Healthcare**

Size: Large (250 employees or more)

Headquarter: Italy

Sector: Health

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

The AI systems provided and/or deployed by the organisation are different regarding purpose, use and people affected. There are cases where AI systems are used internally (organisation as deployer) to optimise operative and administrative processes saving resources and reducing manual repetitive processes (e.g., *Copilot*). In this scenario, the AI system is only used by organisation's employees.

Other systems for which the organisation is provider (according to our current assessment, not AI high risk systems) are designed to support operational and administrative tasks, such as assisting physicians in scheduling surgeries, automating the assignment of billing codes by extracting diagnostic information, and using speech recognition to convert voice dictation into clinical documentation. These systems are generally used by healthcare professionals for administrative purposes.

In addition, the organisation is provider of AI systems which can be classified, according to our current assessment, as high-risk, as they qualify as medical devices and fall down the high-risk requirements of EU AI Act in this regard. For example, AI components can predict possible complications for patients during their hospital stay and can identify adverse events, generating necessary alerts for medical staff. The system is intended to interact with natural persons, i.e., attending physicians in healthcare facilities but is not provided directly to the natural persons.

On the AI literacy approach

Status: Partially rolled-out

Target group: Top Management, all organisation's staff and, targeted organisation's staff, in particular, legal, DPO, compliance, quality assurance and regulatory affairs departments (QARA), developers and engineers.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The practice is **tailored to different groups based on their technical background and responsibilities**. High-level sessions will provide foundational AI knowledge and AI Act awareness to management, all employees and targeted organisation's staff. The goal is to highlight the opportunities and risks associated with AI, as well as its potential impacts on operations together with the most relevant compliance aspects.

- The **first trainings** planned take into account the technical knowledge, experience, education and training of the target group. The **Executive committee** was trained taking into account its role. Trainings planned for DPO, legal, QARA and compliance departments will be focused also on **technical aspects** to improve their specific knowledge. Trainings for developers and engineers, instead, will be more focused on **legal and compliance aspects** of the EU AI Act so to complement their knowledge.
- **Training for all employees** will be organised to ensure all employees understand the importance of AI systems, their functionality and application within the organisation. The training will be focused on fundamentals of AI, its benefits and risks, ethical considerations, practical usage with use cases and best practices.
- **Advanced trainings** for technical teams will address specialised areas.

How does the practice take into account the context in which the AI system(s) is/are used?

Our organisation ensures that its practices take into account the context in which AI systems are used by **evaluating our products against the prohibited practices outlined in the AI Act**, as well as their **intended purpose and use** in the healthcare sector, which is where the organisation operates in. Additionally, recognising that some of our AI systems are classified as high-risk, we incorporate this understanding into our AI literacy practice. This approach ensures that our practice aligns with the healthcare sector's needs.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The practice is still being rolled out, therefore there are no quantitative KPIs measured yet. Specific **platforms** will be used to deploy trainings and track attendees and completion progress. As a qualitative KPI, initial trainings which were done in the last year led to an **increased interest and request for more information around AI usage obligations**.

Which challenges has the practice addressed and what issues is the organisation still facing when implementing the practice?

The main challenge is related to the target audience selected in the first phase. The main goal was to train all the workforce but considering the early stage regarding the Regulation and its implementation,

proceeding step by step is a good choice, preparing firstly the departments directly involved in the main EU AI Act provisions.

Another significant challenge in the AI literacy practice we are still facing when developing the training for all employees is identifying the appropriate topics to include, to ensure that the content is relevant, clear and understandable to such a broad audience. We need to provide basic knowledge while also introducing more complex aspects of AI functionality making sure it's still comprehensible and accessible to all employees and those who do not have much experience in AI. At the same time, the training should allow everyone to apply what they learn in their daily work.

Additionally, the practice aims to address the following challenges:

- **Understanding AI capabilities and limitations:** the AI literacy practice aims to equip participants with a comprehensive understanding of artificial intelligence and its applications within the organisation.
- **Integration into existing workflows:** the AI literacy practice aims to provide targeted training on how to use AI tools in real-world scenarios, teaching professionals how to complement their skills with AI capabilities.
- **Compliance with regulatory requirements:** the literacy practice aims at educating users on relevant regulations and best practices ensuring that they understand how to use AI responsibly and in compliance with legal standards.

Is the organisation planning to change and/or improve the practice?

The program is expected to change and continuously improve to expand **role-specific training** and adapt based on **participant feedback** and/or new guidance from the relevant stakeholders and/or regulators.

Eyer

On the organisation

Name: **Eyer**

Size: Micro (1 to 15 employees)

Headquarter: Norway

Sector: ICT

The organisation is a: ☒*Provider*/☐*Deployer* of AI systems

AI system(s) provided and/or deployed:

Eyer provides Autonomous Machine Learning algorithms that power scaling monitoring to all your data without manual labour. Eyers core value is early warnings with actionable insights to prevent failures on IT systems / systems with time series data. Eyer delivers AI as a service to our customers, so AI is core to the company and our employees.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff, i.e. **all roles in the organisation.**

As a small AI company with 4-5 employees that started just one year ago, it is crucial for us to have all employees involved and to ensure an up-to-date and good understanding of AI. This includes practical and technical use, but also possible impacts and implications.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Eyer provides different **trainings based on position and technical knowledge**.

Non-technical personnel is typically trained with a focus on value delivered, safety mechanisms to restrict sensitive content and how to ensure that our own AI is working as intended and within scope. We provide a high-level technical introduction to machine learning (ML) and other popular variants of AI, exploring how they can be used and best practices.

For technical personnel, we typically cover the complete architecture of our own AI, including ML models and processing pipeline, how it should be monitored, and within which limits it should operate. We include introductions to other AI types besides our own, as this is an essential part of how Eyer works in an AI agent ecosystem.

How does the practice take into account the context in which the AI system(s) is/are used?

Since Eyer is a generic AI solution focusing on anomaly detection and alerting, our own implementation scope is broad and varies from customer to customer. Besides our own AI, internally we extensively use different AIs in our work. **Our training focuses on how different AIs provide different value and require different input. It is also important for us to provide knowledge on how the different AIs work on a technical level**. Training also covers security, privacy implications and accountability. Internally, we make available all the mechanisms of our own AI online in a shared document repository. In this way, new employees and customers have full transparency and insight.

What has been the impact of the practice so far and how does the organisation monitor such impact?

Since Eyer is an AI company in **a startup phase,** and currently a small organisation, we have very good control on AI training, AI knowledge, implementations and potential impact of AI. All employees are involved in the work on the EU AI Pact and the work of implementing new customers and are highly skilled on AI in general.

The practice ensures that we have a certain level of **documentation and guidelines** that ensures every employee is brought quickly up to speed. We also frequently discuss different aspects and impacts of AI internally in meetings and workshops. Thus, we are able to closely monitor any knowledge gaps and take action when necessary. Currently all employees are trained.

To monitor potential gaps in the training, **we monitor the number of people who engage with AI tools post-training**; in creative work using AI, support content writeup, go-to-market automations, context enrichment with AI and in direct customer cases.

Which challenges has the practice addressed and what issues is the organisation still facing?

Currently, no particular challenge is reported.

Is the organisation planning to change and/or improve the practice?

We will **ensure that AI literacy and training is a default when onboarding new people**, and a continuous ongoing process across the organisation to enable awareness and knowledge.

Gjensidige Forsikring ASA

On the organisation

Name: **Gjensidige Forsikring ASA**

Size: Large (250 employees or more)

Headquarter: Norway

Sector: Insurance

The organisation is a: ☒ *Provider/* ☒ *Deployer* of AI systems

Type of AI system(s):

Gjensidige Forsikring ASA utilises several AI systems for various use cases. Gjensidige Forsikring ASA is both a provider and deployer of AI systems. According to our current assessments, most use cases are limited to low risk in the framework of the EU AI Act. Yet, Gjensidige Forsikring ASA is also a provider of high-risk AI system as described in the EU AI Act Annex III no. 5c.

All AI systems provided by Gjensidige Forsikring ASA are exclusively deployed within the organisation. Consequently, our AI literacy initiatives are focused on Gjensidige Forsikring ASA employees.

The people affected by the use of our AI systems varies according to the use cases and it ranges from some employees to all employees, all private customers, and employees in corporate customers.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff

Currently, the practice here presented is **exclusive for Gjensidige Forsikring ASA employees**, as all AI systems are deployed within the organisation.

Gjensidige Forsikring ASA is however **working on making training materials available to third parties**, such as insurance agents and individuals involved in the claims process, who use AI when acting on behalf of Gjensidige Forsikring ASA. Additionally, Gjensidige Forsikring ASA is exploring ways to provide our customers with sufficient AI literacy to understand how our use of AI affects them. Any information made available to customers will adhere to principles of universal design and will be written in an accessible manner.

The practice covers diverse topics such as the technology, use cases, how to use and not use AI systems, legislation, Gjensidige Forsikring ASA's policy on AI, best practices, ethics, security, privacy, overlapping legislations and supervisory expectations, mitigating actions etc. Depending on employees' role, topics such as ethics, diversity, inclusion, discrimination, and universal design are also covered. Yet, the practice design is not targeted to specific gender identities or ethnic groups specifically.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Gjensidige Forsikring ASA follows a **learning and development model** where development of competences takes place through the practice of daily tasks, organised teaching and training. Gjensidige Forsikring ASA has a culture of management and competence that provides a competitive advantage.

All employees should have a sufficient level of AI literacy, which varies based on their roles and responsibilities. All employees achieve a **foundational level of AI literacy** through a **mandatory e-learning course. Further training is tailored to various roles** and responsibilities to ensure it remains relevant, manageable, and appropriate. Role-based training is a cornerstone of Gjensidige Forsikring ASA's practice. In role-based training and in-person presentations, the training is adapted to the various roles, their responsibilities, and tasks, while still considering the diversity within these roles. For example, training for analysts is tailored to focus on model risk management, data governance, and their specific responsibilities within the AI value chain. This training takes into consideration the type of data involved, such as varying levels of sensitive data or personally identifiable information (PII), and the risk associated with the use case and AI system they are working with, particularly in high-risk or high-impact scenarios. Employees in risk, compliance, and security roles receive more generalised training. This is because their role involves supporting other employees in AI risk management, necessitating a broad understanding of risk. End users involved in claims management are provided with training specific to the AI systems they use, including the potential risks associated with AI in claims management.

The **training and information materials** aimed at all employees are designed to be easily accessible and understandable for those with little or no technical knowledge, experience, education, training, or interest in artificial intelligence, regulation, and other overlapping topics.

When relevant, AI literacy is verified during the **recruitment process**, and training on ICT and AI systems is part of the onboarding process (this varies from case to case).

For AI systems for which Gjensidige Forsikring ASA is provider, the training is individualised and **provided by colleagues**. For AI systems for which Gjensidige Forsikring ASA is deployer, the training is primarily based **on materials and guidance provided by the system's provider** or other freely available training materials.

Gjensidige Forsikring ASA's practice includes a **multi-channel approach to reach all employees** and ensure repetition of the training material. Overall, to disseminate AI literacy, we use:

- the **intranet,**
- **a mandatory e-learning course for all employees**,
- a **knowledge hub accessible to all employees**,
- an **internal communications platform for informal knowledge sharing** and support,
- **in-person presentations, workshops, and webinars** to provide **role-based and more engaging training**.
- Moreover, Employees can apply for a course on **AI in the financial industry**, developed by Gjensidige Forsikring ASA in collaboration with other Norwegian financial undertakings and BI

Norwegian Business School. Employees can apply for the entire course or individual topics, with the full course offering 7.5 ECTS credits.

Gjensidige Forsikring ASA holds a unique position in Norway due to its size, market share, reputation, and expertise in various topics. We acknowledge and embrace the social responsibilities that come with this position and therefore **collaborate and share expert knowledge with other Norwegian and Nordic companies, research institutions, academia, and other organisations**. Employees participate in various external events such as seminars, round table discussions, and podcasts, both as presenters and audience members, to gain and share knowledge. Gjensidige Forsikring ASA also utilises consultancy firms and internships to gain external, updated, and objective competence and perspectives.

How does the practice take into account the context in which the AI system(s) is/are used?

As an insurance undertaking, Gjensidige Forsikring ASA is heavily regulated and is already subject to regulations and supervisory expectations that cover Gjensidige Forsikring ASA's use of AI and relations with customers and employees. When relevant, training in Gjensidige Forsikring ASA takes into consideration both **general and sector specific requirements and practices. The practice distinguishes on use of AI for internal processes and customer-facing use.**

Gjensidige Forsikring ASA maintains a **registry for all AI systems, AI models, and AI use cases.** The intended purpose of each AI system is registered and made available to end users. Additionally, Gjensidige Forsikring **ASA's knowledge base on AI includes links to training materials provided by the AI system provider,** giving end users access to system-specific training materials and guidelines on how to use and not use an AI system, provided the information is accessible and the links remain stable to avoid frequent changes or deletions.

What has been the impact of the practice so far and how does the organisation monitor such impact?

It is too early to measure the impact of our AI training, as it has only recently been made available. Gjensidige Forsikring ASA will explore methods to assess the impact of this practice moving forward. Our deployed solutions enable us to **monitor participation and completion rates**, and this data is being actively tracked.

Which challenges has the practice addressed and what other issues is the organisation still facing?

As an insurance undertaking with employees from diverse backgrounds working in various roles across the Nordics, it is evident that a role-based approach is necessary for success. Without this approach, employees may receive either too much or too little training and information. **Finding the correct amount of training and the best platform to deliver it is challenging**, as the practice competes with several other highly relevant topics and the vast amount of information provided to employees through multiple channels. **There is no one-size-fits-all solution.** Therefore, it is important to repeat the training at appropriate intervals and through various channels, ensuring the information is relevant to each employee to create sufficient AI literacy and awareness.

Is the organisation planning to change and/or improve the practice?

Following a risk-based and proportionate approach, Gjensidige Forsikring ASA will continuously adapt and improve its AI literacy practice based on technological and regulatory developments, changes in how technology is used within the organisation, and the maturity of our employees. The practice will also evolve as providers make more training available. Additionally, Gjensidige Forsikring ASA will work on **making training materials available to third parties**, such as insurance agents and individuals involved in the claims process who use AI when acting on behalf of Gjensidige Forsikring ASA. We are also **exploring ways to provide our customers with sufficient AI literacy** to understand how our use of AI affects them.

INECO

On the organisation

Name: **INECO** (INGENIERÍA Y ECONOMÍA DEL TRANSPORTE S.M.E.M.P., S.A)

Size: Large (250 employees or more)

Headquarter: Spain

Sector: Public administration

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Our organisation develops and implements AI systems for internal use and also to enhance the quality of services offered to public administrations: transportation sector (railway and airports), civil engineering, digital transformation for the public administration (justice, healthcare, etc). These systems, for example, analyse topographic information alongside meteorological data from various stations, enabling predictions of temperature, rainfall, and potential flooding scenarios. They also support anomaly detection in rail segments, roads, construction materials, and buildings.

We also develop projects internationally with the same focus and sectors of application as the national projects, taking into account how the AI Act affects these projects.

So far, we have not identified any prohibited AI systems. However, we continuously assess each AI-driven project to determine its potential level of risk and ensure compliance with relevant regulations. As of now, our evaluations indicate that none of our solutions fall into the high-risk category, but we remain vigilant in monitoring and updating our practices in line with evolving legal and ethical standards.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff

The practice is designed for two main groups within the organisation.

- First, it provides broad, company-wide training to **all employees**, focusing on foundational AI knowledge and emphasising security best practices.

- Second, there is **specialised training available for technical roles and project managers** who are directly involved in **developing or overseeing AI systems and models.**

This ensures that everyone has a baseline understanding of AI safety and ethics, while those working on AI projects receive more in-depth, targeted instruction.

At INECO, no specific distinctions are made regarding employees' gender or ethnic background. However, accessibility for people with disabilities is a primary consideration in all our training activities. Our **AI Master Classroom courses**, for example, provide both audio and subtitles, ensuring they are available in a fully audiovisual format. Additionally, we remain committed to inclusivity by actively identifying and addressing the needs of employees with other types of disabilities, in line with universal accessibility principles.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

We have developed a **structured training plan** that offers specialised courses, taking into account each participant's existing knowledge, experience, and educational background. These courses are also tailored to the **specific requirements of both ongoing and future projects**, ensuring that employees acquire the relevant skills and expertise needed for effective AI implementation.

The training tracks are organised into progressively advanced levels, and in some cases, they diverge into specialised branches for **different types of AI**—such as **classic machine learning, neural networks, large language models (LLMs), computer vision, robotics, and generative AI**—according to the particular needs of each project.

How does the practice take into account the context in which the AI system(s) is/are used?

Due to the nature of our company's work and the sector in which we operate, we generally do not handle personal data—except for employee data. We primarily work with publicly available sources, such as meteorological data, and adapt our training programs accordingly. These programs include both general material on AI, machine learning, and generative AI, but are further tailored with technical terminology and use cases relevant to transportation, especially in railway operations.

Additionally, we take into account prohibited and high-risk AI systems that may arise in our projects—for example, the recognition of individuals in public spaces—ensuring that all solutions are correctly developed, documented, and compliant with the applicable EU AI Act.

What has been the impact of the practice so far and how does the organisation monitor such impact?

In 2024, we have conducted over **20 AI-related training sessions**, **with more than 400 attendees**. Furthermore, our publicly accessible AI Master Classroom, available through the company intranet, offers concise modules designed to provide essential knowledge, best practices, and practical use cases. One of the primary impacts of the training initiatives has been a comprehensive **redesign of our training plan.** During initial assessments, we identified substantial gaps in both basic and advanced AI knowledge—covering not only technical but also regulatory and project management dimensions. Consequently, we have expanded our curriculum to thoroughly address these areas.

Another notable effect has been the **swift adoption of best practices around AI tools** such as chatbots. We have limited the use of public large language models (e.g., ChatGPT) while raising employee **awareness about potential risks, like data leakage.** This approach has led us to secure chatbot solutions, reflecting a proactive stance toward data privacy.

Although our AI-focused training initiative is relatively new, it remains ongoing due to its success. **Over 10% of our staff have already received specialised AI training**, and we aim to extend additional training

modules to 100% of our workforce throughout 2025. We also offer hybrid programs that integrate AI knowledge with other vital disciplines in our transportation projects.

From a monitoring perspective, we track both qualitative and quantitative KPIs. For instance, we measure the proportion of employees completing each training track, gather participant feedback on content relevance, and examine project outcomes influenced by AI utilisation. This continual evaluation allows us to adjust and enhance our training practices, ensuring their ongoing effectiveness and alignment with our organisational objectives.

Which challenges has the practice addressed and what issues is the organisation still facing?

One of the main challenges addressed by our practice has been **overcoming the natural resistance to cultural change within the organisation**. This is particularly evident among senior professionals who have worked in the same way for decades, often without the need for AI-assisted tools. By introducing comprehensive training and highlighting the tangible benefits of AI, we have started to reduce this resistance and encourage broader adoption.

Another challenge lies in the **shortage of qualified experts** capable of designing and delivering AI training. While some employees possess strong technical expertise, they may lack the necessary teaching skills. To address this, **we are providing "train the trainer" programs** for highly skilled personnel, equipping them with the pedagogical tools needed to effectively teach AI-related topics to the rest of the workforce.

Finally, **selecting the right licenses, platforms, and technologies remains an ongoing issue**. Given the increasing number of solutions on the market—and our variety of clients with diverse needs—it can be difficult to determine the most suitable frameworks for each project. Moreover, we currently lack a fully unified technological framework, meaning that different teams and clients might rely on separate tools even if they perform similar functions. We continue to work towards developing a more cohesive, standardised environment to streamline AI adoption and maintain consistency across the organisation.

Is the organisation planning to change and/or improve the practice?

We have **updated our training plan** to address emerging challenges and ensure our workforce is well-prepared. In parallel, we are training in-house experts to share their knowledge, highlighting both the potential and the risks of AI within INECO. All of this is tailored to the specific nature of our projects and the primary tools we use.

Furthermore, we are introducing a **dedicated methodology to promptly identify any project involving AI that may fall under specific risk levels**. By doing so, we can quickly adapt our processes and practices to comply with existing the EU AI Act. This ongoing refinement and proactive monitoring aim to keep our organisation aligned with the latest legislative requirements and best industry standards.

To further strengthen our AI initiatives, we are establishing a **Centre of Excellence (CoE) and an AI Governance Office**. The CoE will focus on fostering innovation, developing best practices, and ensuring the continuous improvement of our AI capabilities. Meanwhile, the AI Governance Office will be responsible for overseeing the ethical and responsible use of AI across all projects, ensuring compliance with regulatory requirements, and mitigating potential risks.

Palantir Technologies Inc.

On the organisation

Name: Palantir Technologies Inc.

Size: Large (250 employees or more)

Headquarter: U.S.A.

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Palantir builds software that empowers organisations to effectively integrate their data, decisions, and operations. The software systems we build for our customers include general-purpose AI systems designed for a variety of sectors and applications and can support a wide range of businesses and public institutions. Our AI systems may potentially be configured for specific use cases that may be considered as "high-risk" depending on several contextual factors, including their specific use, their potential impact, and the nature of the data processed. As a consequence, some of our AI systems may be considered high-risk based on their application, while others are not. When configuring our AI systems for specific use cases, our customers are conducting their respective assessments, with direct and transparent support from Palantir if required. Palantir also uses certain AI systems for its internal operations.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff.

Palantir is on its way to achieving a robust level of AI literacy internally. All members of Palantir's staff are currently expected to comply with Palantir's AI best practices, policies and guidance aimed at ensuring AI safety and an ethical implementation of AI. In addition, AI literacy training is being rolled out to all Palantirians with the expectation that they maintain an understanding and proficiency necessary to effectively perform their individual job functions and responsibilities, particularly those involved in the operation and use of AI systems. Palantir's standard on-going training opportunities also include AI ethics and governance items, as well briefings on the implications of AI (and other related) regulation to Palantir and its employees.

Our latest AI literacy initiatives extend and build upon our on-going, multi-year efforts to develop, implement, and share insights into our work on responsible AI technologies. We have publicly documented this at length over time through various publications. These include our Approach to AI Ethics, which states our principles and methodologies for addressing societal risks in the development and use of our software systems; our ongoing blog posts (e.g., Engineering Responsible AI , Responsible AI in Palantir Foundry, A Palantir Primer on the EU AI Act) and our Responsible AI Lifecycle ("RAIL") whitepaper.

In order to enhance employees' understanding of AI, Palantir is setting up an **"AI Literacy Hub"** which is an internal-facing set of learning resources available to all the organisation staff, tailoring resources to various job functions at Palantir. Many of the resources comprising our AI Literacy Hub mirror and

elaborate on the topics and content addressed in public-facing documents referenced immediately above. Furthermore, the AI Literacy Hub will be actively promoted amongst Palantir staff, including during annual **compliance trainings** for existing personnel and during onboarding for new personnel, so that employees can further educate themselves about AI.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Although Palantir's AI Literacy Hub is still at an early stage of implementation, different resources in our AI Literacy Hub are already **tailored for different technical knowledge, experience**, education and level of training. For instance, we make available in-depth AI literacy resources for our engineers leveraging AI daily and who may already carry a deep understanding of both the risks and opportunities associated with AI. But we also provider resources aimed at educating other employees starting from less developed AI experiences and knowledge. For completeness, Palantir plans to make available even more tailored AI literacy resources to the **varying roles, responsibilities, knowledge and experience** of our workforce (for instance, materials on ethical coding practices for our engineers).

Ultimately, Palantir's AI Literacy Hub will notably contain: learning materials on AI foundations (such as basic definitions and technical aspects of AI), materials explaining the internal and customer-facing use of AI at Palantir, materials explaining the risks and challenges relating to AI (such as bias, hallucination, inappropriate uses, and privacy and security risks) as well as any appropriate mitigating measures, Palantir's internal guidelines, policies and principles for a safe and ethical use of AI, materials explaining the legal aspects and risks relating to AI (including with regard to the EU AI Act) and internal and external materials to deepen employees' understanding of AI. These materials will be continuously maintained and updated as the technology, best practices, industry standard, and applicable law and regulations evolve.

How does the practice take into account the context in which the AI system(s) is/are used?

To date, different resources in our AI Literacy Hub are tailored to use or deployment of AI systems in **different contexts, e.g., customer-facing configuration in specific industries and for specific uses**, internal use for different job functions, etc. In particular, Palantir is working diligently on elaborating AI literacy resources (such as internal guidance and best practices) customised to address the specific challenges and job functions of its employees involved in customer-facing configuration of its AI systems.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The impact of our practices is yet to be fully determined as they are still in the early phases of implementation. We are currently defining the relevant KPIs to help assess their effectiveness. These KPIs are being strategically designed to capture both qualitative and quantitative aspects of the practice. We recognize that while **some KPIs (e.g., coverage of employee base, frequency of training**) may lend themselves readily to quantitative evaluation and data-driven insights and reporting, other measures of program success will need to address important "softer" or qualitative features of AI literacy practice impact. We are committed to the adoption of KPIs that most sensibly and faithfully reflect aspects of AI literacy that substantively address the areas of risk and opportunity most salient to our business, regardless of what specific form those indicators may take.

Which challenges has the practice addressed and what issues is the organisation still facing?

Precise details are, at this stage, difficult to articulate as we remain in the initial phase of the practice implementation. We are currently focusing on identifying challenges and cultivating effective, scalable solutions in response.

Is the organisation planning to change and/or improve the practice?

Although we already have substantive AI literacy resources available to our staff, we consider that we remain in the initial phase of the practice implementation. We are actively working on making our AI literacy practice **as comprehensive as possible** so that our staff achieves AI literacy excellence. As mentioned above, we are currently focusing on identifying challenges and cultivating effective, scalable solutions in response.

Smals

On the organisation

Name: **Smals**

Size: Large (250 employees or more)

Headquarter: Belgium

Sector: Public administration

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

In response to the recent developments in general-purpose AI and the consequent surge in demand for AI solutions from both our clients (public administrations) and our internal business, we have initiated several initiatives most of which are in the pilot phase or in the proof of concept/prototype phase. None of them has been identified as high-risk. These initiatives include:

- Chatbots based on RAG (Retrieval Augmented Generation). The chatbots aim at enhancing information accessibility for citizens seeking assistance or information by providing answers to questions related to the information owned and managed by our clients. These chatbots will be integrated into our clients' publicly accessible websites.
- AI-enabled tools that extract valuable insights from caseworks and business data. The objective of this initiative is to improve operational efficiency throughout the organisation. It will enable both our internal teams and our clients' teams to save time and make informed decision. The key features of these AI systems encompass functionalities such as smart search, recommendations and automated report generation.
- Research assistant. An automated literature search assistant that gathers material for researchers in the social security sector by selecting from multiple sources pertinent papers that support their queries.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff

Our AI literacy practice is designed to be **role-based**. In line with our AI strategy, we have identified the specific roles needed within the organisation to handle our projects. We then determined the unique **tasks and required knowledge of each role**, ensuring that our training is relevant and practical. Our AI literacy program is developed by AI experts, human resources team and team managers. Our practice does not account for specific gender identities, ethnic groups or people with disabilities.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The AI literacy program is flexible to accommodate the diverse expertise of the company employees. Our program is finely granulated and **divided according to roles and functions**. We take into **consideration the technical backgrounds of our employees** to effectively address the needs of different teams. Moreover, we prefer interactive workshops for foundational knowledge. The content of each training session is discussed and customised with the training provider to ensure it aligns with our learning requirements and the technical backgrounds of the attendees.

- **Required knowledge for all employees:** Awareness about AI capabilities, risks and limitations; Knowledge of the policies and guidelines that apply within the organisation; Understanding on using AI chatbots efficiently to perform basic tasks. This general information is delivered through in-person presentations or webinars conducted by employees who develop AI systems. The training is adapted to the audience; for example, in our HR department the emphasis will be on the impact of AI on work.

- **Required knowledge for AI ambassadors:** Knowledge about AI's strengths and limitations to identify and prioritise AI use cases. Their role involves promoting and facilitating the adoption of AI technologies to maximise value and effectiveness. This course is **delivered by an external provider.**

- **Required knowledge for AI experts:** The AI experts design, develop, deploy and support AI systems. They must have a deep knowledge about AI approaches, AI governance, AI techniques, models, tools and frameworks and they are proactively engaged in continuous learning. They also need a thorough understanding of AI ethics and regulatory obligations. The training of AI experts is diverse and includes **self-paced e-learning, participation in seminars, virtual training or in-person workshops** provided by external partners and hands-on practice.

- **Required knowledge for data engineers:** Understanding the AI specific requirements with respect to data acquisition, integration and preparation; Knowledge of data governance. The training of data engineers includes **self-paced e-learning, virtual training or in-person workshops** provided by external partners and hands-on practice.

- **Required knowledge for architects, developers, infrastructure specialists:** Knowledge about the management of AI infrastructure and platforms; Knowledge about the deployment and monitoring of AI systems; Understanding AI requirements with respect to governance. The training of this group includes self-paced e-learning, virtual training or in-person workshops provided by external partners and hands-on practice.

- **Required knowledge for** those whose work is particularly impacted by generative AI **(e.g., web content creators, Developers, Project managers):** specialised training, targeted to their job. Typically, they must harness vendor provided AI augmented software tools. The courses are provided by **the software vendors.**

- **Required knowledge for Data Protection Officers and Legal team:** Knowledge about AI ethics, AI governance, risks and regulatory compliance. These group required specialised trainings provided by external partners in-person or on-line.

How does the practice take into account the context in which the AI system(s) is/are used?

Before initiating each new AI project, we conduct a **training session for all relevant stakeholders**, in addition to our role-specific training programs. This high-level training is **tailored to the specific context** of the AI system and focuses on the particular AI technologies used for the development of the system. Emphasis is put on understanding the future system capabilities, limitations, risks, and governance requirements. Priority is given to subject matter experts, who play a crucial role in guiding design decisions and validating the AI system.

For all stakeholders, a thorough presentation will be given on the **capabilities and risks identified in the particular project**. The presentation will also cover ethics and legislation, as well as high-level governance principles and will be provided by AI experts supported by a legal team and/or DPO. For subject matter experts, training on common errors in AI systems and how to evaluate the AI system will be provided by AI experts. Additionally, they will learn to understand and interpret the output of the AI system, as well as recognise common pitfalls. This training will be given in the design phase.

What has been the impact of the practice so far and how does the organisation monitor such impact?

Although our organisation AI literacy practices are still in their early stages, we have begun observing:

- **Increased participation from employees**: Our initial AI training sessions have stimulated internal innovation, leading to numerous proposals for business processes improvement.
- **Enhanced understanding in using AI tools** to improve efficiency: There is a growing demand for data and process insights.
- **Greater awareness regarding the risks associated with AI**: Our team is adopting a cautious approach to AI applications such as chatbots, respecting data privacy and carefully interpreting their outputs.
- **Continuous learning**: The demystification of AI has instilled curiosity and self-learning.

After undergoing specialised AI trainings, our customer-facing personnel, such as functional analysts, are anticipated to identify more opportunities for AI integration. As a result, we are expecting increased demand for AI projects.

Our AI literacy program will be assessed using the **KPIs such as:** Number of new AI initiatives within our organisation; Employee engagement: We will track the number of proposals for automating tasks and processes, demonstrating the level of employee involvement; Cost savings, by monitoring the operational efficiency gains from AI adoption. However, evaluating our readiness to meet evolving customer needs is still challenging.

Which challenges has the practice addressed and what issues is the organisation still facing?

Our company is an IT company, and a significant number of employees are interested in AI technology. They have been proactively seeking to acquire some knowledge in the field and they have explored AI application opportunities. However, there is deficiency in **understanding AI governance and responsible implementation**. Our AI literacy program provides an adequate framework to identify and fill the skills gap.

The main hurdle we face is preparing ourselves to tackle AI projects internally and externally. We need to **anticipate the necessary expertise to meet the demand for AI systems** while the needs are not fully identified. Furthermore, implementing our AI literacy program requires **substantial resources and is time demanding**. We prioritise the training needs based on project timelines and the potential risks of the AI systems: the higher the risk, the higher the requirement for AI expertise.

Additional challenges include keeping up with the rapid pace of AI evolution, evaluating the impact of AI literacy program, finding adequate materials for training (most academic courses and vendor trainings are theoretical and illustrated by examples that may not directly apply to our context).

Is the organisation planning to change and/or improve the practice?

Our AI literacy program has not been fully implemented yet, but we have made some minor adjustments in response to the feedback received during the initial information sessions.

Studio Deussen

On the organisation

Name: **Studio Deussen**

Size: Micro (1 to 15 employees)

Headquarter: Germany

Sector: Creative Industry; immersive story telling / virtual world for science, industry and culture.

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Our XR studio is dedicated to enhancing AI literacy among our **artistic and development teams**, recognising AI's transformative potential in optimising workflows and fostering creativity.

AI Systems developed and deployed are used for:

- Content Generation: Utilising generative AI models to produce dynamic 2D and 3D assets, audio elements, environments, and narratives within XR experiences. This enables personalised and adaptive content that responds to user interactions in real-time, enhancing immersion and engagement. These models are also used in virtual worlds for industry, culture, and science use cases.
- Natural Language Processing (NLP): AI-driven chatbots and virtual assistants designed to facilitate intuitive user interactions by providing guidance, information, and support within immersive

environments. For instance, one chatbot is tailored for an educational children's project focused on climate change, aiming to deliver information in an engaging and age-appropriate manner.

- Computer Vision: As part of a smart city project, AI is employed for object recognition and tracking, utilising models like YOLOv8 to analyse traffic patterns in public plazas. Privacy and data safety measures are implemented to prevent the recognition of individual people, focusing solely on vehicular traffic analysis.
- User Behaviour Analysis: In educational and artistic contexts, AI algorithms analyse user interactions to adapt experiences in real-time, enhancing engagement and learning outcomes.
- High-Risk Assessment: According to the EU Artificial Intelligence Act, AI systems are classified based on the level of risk they pose to health, safety, and fundamental rights. High-risk AI systems are subject to stringent regulatory requirements to ensure their safety and compliance.

Content Generation and NLP systems are primarily used for entertainment, education, and user engagement within controlled environments. They do not involve decision-making processes that impact individuals' fundamental rights or safety.

While the Computer Visions system analyses public spaces, it is designed with privacy-preserving measures to ensure that individual identities are not recognisable, thereby mitigating potential risks.

The User Behaviour Analysis Employed in educational and artistic settings aim to enhance user experience without infringing on personal rights or safety.

Based on our assessment in accordance with the definitions and criteria outlined in the EU AI Act, our AI systems do not fall under the high-risk category. They are designed with user safety and privacy in mind, adhering to best practices and ethical guidelines to ensure transparency and reliability. By investing in AI literacy and deploying these AI systems, we aim to empower our team to harness the full potential of AI, driving innovation and maintaining ethical standards in our creative endeavours.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

The AI Literacy practice of our Studio covers both:

- **Training:** Comprehensive programs on AI concepts, ethical considerations, practical applications within creative workflows, and new AI-based aesthetical styles. These programs empower team members to use AI tools effectively and responsibly.
- **Skill Development:** Initiatives to integrate generative AI into work processes, enhancing efficiency, innovation, and creativity. These initiatives use generative design principles based on human-centred design to improve skills.

The practice targets the following staff in the organisation:

- **Creative & Design Teams** (e.g., concept artists, writers): Learn to integrate generative AI for art, storytelling, and user experience while preserving human creativity.
- **Technical & Development Teams** (e.g., developers, data scientists): Focus on model selection, fine-tuning, data integrity, and ethical safeguards across projects.
- **Project & Product Managers**: Coordinate cross-functional AI initiatives, ensuring feasibility, resource allocation, and ethical compliance.

- **Operations & Admin** (e.g., HR, finance, legal): Adopt AI tools for workflow optimisation, policy adherence, and inclusive practices.
- **Leadership & Strategy** (e.g., CEOs, CTOs): Drive AI vision, risk management, and sustainable innovation aligned with organisational goals.

The practice targets the following other persons:

- **Clients** (including non-technical staff): Gain insight into AI-driven solutions, enabling informed decisions on product or service innovation.
- **Sub-Contractors & Freelancers** (e.g., production teams, developers, artists): Align with project workflows, ethical guidelines, and technical standards.
- **Independent Creatives** (e.g., solo artists, filmmakers, writers): Explore AI as a creative medium, integrating new tools into their artistic processes.
- **Partner Companies & Organisations:** Upskill their teams through shared workshops, co-creating AI solutions that maintain responsible and inclusive practices.

Our AI-Literacy training is designed to be **inclusive and accessible** to all employees, regardless of gender identity, ethnic background, or disability. We ensure that our training materials and sessions are culturally sensitive and free from bias. Additionally, we provide accommodations for employees with disabilities, such as accessible formats and assistive technologies, to ensure everyone can participate fully. Furthermore, we use large language models (LLMs) to adjust the language of the training to the user's native language, ensuring that everyone can understand and benefit from the training.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Our AI-Literacy training consists of four elements:

1. **Workshops:** These cover general AI knowledge and are designed to include diverse user groups. The aim is to: a) Teach the basic concepts of AI usage, such as the difference between machine learning and generative AI; b) Start a dialogue across different target groups, so employees can understand AI usage across various domains.
2. **Use Case Descriptions:** These are provided across different sectors to illustrate practical applications of AI.
3. **Practical Exercises:** These are aimed at: a) Collaboration between different team members; b) Improving the usage and understanding of AI in specific workflows, such as generative cross-media pipelines, like transforming a narrative text into generated video sequences.
4. **Personalised AI Agents:** Using custom GPT to define and accompany the personal learning journey. For example, the chatbot starts with a set of questions to learn the user's current knowledge state, defines an initial learning outline, and adjusts the personal learning journey as it progresses.

How does the practice take into account the context in which the AI system(s) is/are used?

Our AI-Literacy practice emphasises a **four-layered approach**—Context, Sector, Use, and Purpose—to guide both risk assessment and technical implementation:

1. **Context:** We begin by examining the environment and social setting in which an AI system operates. For instance, a Smart City use case involves public spaces where privacy is paramount, whereas a creative project targeting children requires age-appropriate content and safeguards. Understanding

the context shapes our AI-Literacy training so participants learn the ethical, legal, and cultural nuances of data collection, user interactions, and content generation.

2. **Sector:** Each sector (e.g., city planning vs. creative industry) has different regulations, audience expectations, and performance metrics. In city planning, risk assessment might focus on compliance with data protection laws when analysing video feeds. In the creative industry, the spotlight might be on copyright, originality, and inclusive storytelling.
3. **Use:** We tailor AI-Literacy content based on practical tasks the AI will perform—e.g., traffic analyses vs. edutainment. By clarifying the system's function (e.g., object detection vs. generative content creation), participants can better grasp relevant technical pipelines and potential risks (e.g., potential bias in image recognition vs. ethical concerns in AI-driven storytelling).
4. **Purpose:** We emphasise how AI should serve a specific goal—be it optimising traffic flow or fostering climate-change awareness. Linking the system's purpose to user outcomes (e.g., faster city planning decisions or more engaging environmental education) helps learners understand how and why AI is integrated into a project.

Use Case 1: Smart City / Traffic Analyses

- *Context: Public plazas with video surveillance for traffic monitoring.*
- *Sector: City planning—where governance, public safety, and privacy regulations are critical.*
- *Use: Analysing vehicular traffic patterns.*
- *Purpose: Making informed planning decisions to improve infrastructure without compromising individual privacy.*
- *Risk & Technical Insights: Potential medium-level risk due to video data usage; hence, we implement privacy-preserving computer vision models and robust data governance policies.*

What has been the impact of the practice so far and how does the organisation monitor such impact?

Our AI-Literacy practice has yielded measurable improvements in creative workflows, cross-functional collaboration, and overall, AI adoption. Drawing on the inclusive and context-driven approach described earlier, we have identified and monitored the following quantitative **KPIs:**

- **Completion of General Workshops**: Qualitative - Personal reflective projects demonstrating understanding of AI as a general-purpose technology; Quantitative - Workshop attendance rates and final project submission rates.
- **Progress in Personal Learning Journeys**: Qualitative - Growth in creativity and problem-solving skills through real-time AI-driven tasks; Quantitative - Completion scores of assigned tasks and the frequency of proactive AI tool usage.
- **Showcase Presentations**: Qualitative - Cross-department collaboration on demos that highlight AI-based 2D/3D assets or NLP chatbots; Quantitative - Number of internal showcases and stakeholder feedback ratings.
- **Sector-Specific Impact Evaluation**: Qualitative - Team members propose domain-relevant AI use cases—city planning, edutainment, etc; Quantitative - Survey data on perceived AI benefits, including production efficiency and user engagement metrics.
- **Efficiency Gains**: Qualitative - Anecdotal feedback on faster decision-making and streamlined iterations; Quantitative - Documented reduction in production timelines or resource usage for routine tasks.

- **Creative Reflection**: Qualitative - Participant insights into how AI tools expand artistic and technical horizons while maintaining a human-centric approach; Quantitative - Increase in AI-assisted creative outputs (e.g., asset libraries, code commits).
- **Risk and Limitations Awareness**: Qualitative - Ongoing discussions on privacy, ethics, and potential biases; Quantitative: Frequency of ethical reviews or checklists completed before deployment.

On the monitoring side, we conduct **post-workshop surveys** and gather team feedback after each project milestone. We track key metrics (e.g., time savings, user satisfaction) to assess efficiency and creative adoption. We record the extent of AI's impact on design quality, speed, and ethical considerations, ensuring sustained alignment with best practices.

Which challenges has the practice addressed and what issues is the organisation still facing when implementing the practice?

The practice has **reduced knowledge silos and unified teams** with varied backgrounds under a common AI-Literacy framework. By tailoring workshops to each department's unique needs—be it conceptual art, programming, or data analysis—we have fostered **a culture of creative confidence in AI.**

Remaining challenges include:

- **Privacy and Data Governance:** Balancing data-driven insights with user protection, especially for video analytics and personal learning agents.
- **Rapid Technological Shifts:** Maintaining up-to-date curricula and toolkits as AI evolves.
- **Inclusive Access:** Sustaining accommodations for employees of all abilities and linguistic backgrounds, ensuring equitable learning opportunities.
- **Ethical Complexity:** Addressing new areas like bias in AI models, copyright concerns, and the broader societal implications of generative AI.

Is the organisation planning to change and/or improve the practice?

Our main focus is on fostering a co-evolutionary process between human creativity and AI capabilities. Key improvements on our roadmap are the following:

- **Modular Curriculum Updates:** Regularly revising workshops to reflect the latest AI advancements and ethical standards.
- **Enhanced Personal Learning Agents:** Refining GPT-based agents to adapt dynamically, guiding learners through rapidly emerging AI tools.
- **Interdisciplinary Mentorship:** Establishing mentor-mentee relationships to accelerate cross-functional AI adoption in new domains.
- **Strengthened Ethical Frameworks:** Expanding our risk assessment protocols to address shifts in AI risk categories and AGI developments.
- **Creative Safeguards:** Introducing structured reflection phases to maintain human autonomy and critical thinking in the face of increasingly sophisticated AI-generated content.

TIM

On the organisation

Name: **TIM**

Size: Large (250 employees or more)

Headquarter: Italy

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

At TIM we are focusing on adoption components that concern both internal and external processes.

From the point of view of internal operations support, we are adopting different tools that allow for example support to software development, the creation of reports, the diffusion of knowledge through the provision of interrogation systems of all the information and documentation. In the case of internal use of AI systems, the purpose is related to processes optimisation for a better network functioning and service provision, and it mainly involves TIM's employees.

From an external point of view, we are working on the transformation of Customer Care to provide better service and operational support on assistant channels: e.g., enhance the customer experience using co-pilot assistant and increase the customer satisfaction through customised content and speech analytics. In the latter case, the purpose aims at improving the interactions with the customers that are the main people affected. TIM develops AI products and projects as well as integrating third party solutions for its enterprise customers, such as intelligent analytics, anomaly detection, chatbots, intelligent search engines powered by generative AI and many more. The target customers range from Global groups to SMEs.

We are currently assessing if some use cases could fall under the high-risk category according to the AI Act.

On the AI literacy approach

Status: Partially rolled-out

Target group: Organisation's staff; Other persons dealing with the operation or use of the system(s)

TIM launched several initiatives addressed to its employees and is intensifying its efforts. In the last 2 years, we have engaged 7000 employees with 25.000 training hours on machine learning and data science, **a course available to the entire workforce** on our dedicated ***TIM Academy Platform*****.** Currently, we are delivering training specifically addressed to **certain departments (HR, Commercial and Financial),** which will be completed by February.

In 2025 we have planned ***AI evangelization pills*** for all our employees, also in line with the requirements of the AI Act, as well as a number of **broader courses tackling main issues that are also related to AI**, such as privacy, security, and compliance, as well as dedicated training to learn how to use the AI tools.

TIM is envisaging to launch the ***AI Tribes*** a community of employees involved in activities related to AI, led by group of **ambassadors**, who will spread the AI culture within the company with blogs, interviews, articles and webinars.

In 2022 TIM launched a **training/reskilling program on AI & Cloud** (*Opening Future*) in cooperation with Intesa Sanpaolo and Google Cloud, addressed to Startups, SMEs and students and teachers. The initiative (7 years lifespan) spans from training on Cloud and AI careers and professions for middle/high school students, to programs involving early-stage startups in leveraging scalable and disruptive technologies up to upskilling for SME personnel on data so to lay the basis for business intelligence and AI developments. The project with Google Cloud includes the creation of a new technology hub, which was inaugurated in June 2024 and is dedicated to the development and testing of the Cloud and AI to demonstrate the technologies' potential when applied to different segments such as smart cities, tourism, manufacturing, retail and finance.

On 12 December 2024, TIM launched the "HighEST Lab", focusing on AI in cooperation with the University of Turin to bridge the gap between research and industry applications.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Courses involve individuals from specific corporate functions, who, despite having different backgrounds, share **similar experience and focus areas**. Training contents are tailored to meet **concrete necessities.**

- **HR AI courses** go deeper into recruiting, talent management and performance appraisal managed with AI tool.
- **Commercial AI courses** are focused on prompt engineering techniques in the commercial reality, such as the use of AI in offer analysis, generating an offer based on conversation, customer analysis and reporting through tools like Chat GPT, Claude, Copilot, etc.
- **Financial AI** delve into online searches reliability, reading external documents, invoices analyses, excel spreadsheet and administrative data analysis.

How does the practice take into account the context in which the AI system(s) is/are used*?*

Courses are **designed based on specific needs** that are identified **interviewing representative of corporate functions**, and **focus groups** are conducted to validate the topics developed during the macro-design phase.

The training initiatives carried out within Opening Future programme are specific to the target group. For example, initiatives such as the Data Reskill Program, dedicated to SME, focused on reskilling personnel by laying the basis of data analytics, building up their skills and introducing artificial intelligence concepts.

What has been the impact of the practice so far and how does the organisation monitor such impact?

For what concerns the *Opening Future* initiative, since 2022 to H1 2024 a total of 16.101 people were involved in training, providing 2.244 hours of training. The total targets for the program (ending 2027) are 20.000 students, 700 startups, 1000 PMI: KPIs have consistently overachieved yearly targets.

The initiatives carried out in this context span from AI Visual Art programmes for first grade schools, to supporting startups with networking and pitch training to better exploit cloud and AI tools to integrate in their product and services ensuring scalability and a more robust value proposition for investors. All projects are designed to fit the training needs of a specific group amongst the ones in target: SME, Startups and Students. All initiatives are collected in the Opening Future Portal.

For what concerns technical training on Google Cloud platform, in 2024 almost 100 people have been involved in 2024.

As for internal current courses, 25.000 training hours, covering 7.000 employees (40%) have been completed. Current courses for HR, Commercial and Finance Departments (see 3.3), 10.000 training hours for 800 employees (5%) will be concluded in February 2025. Additional 30.000 training hours covering almost all employees (97%) are planned for the near future.

Which challenges has the practice addressed and what issues is the organisation still facing when implementing the practice?

For initiatives directed to partners and the ecosystem at large (which comprises very diverse stakeholders), providing training that is both broadly accessible and effective in terms of depth and focus is a challenge and these two aspects need to be correctly balanced.

Is the organisation planning to change and/or improve the practice?

TIM will continue to improve the training programmes and expand the catalogue of courses available. TIM AI experts take part in main standardisation bodies and in European and national innovative projects, also in collaboration with universities, on AI based network solutions; this activity implies a continuous knowledge improvement.

TIM will also continue to participate to the GSMA Responsible AI Taskforce, that recently produced the **Responsible AI Maturity Roadmap**, a tool to allow companies to assess the level of maturity in the AI adoption and help them plan actions to progress in the roadmap.

The **Opening Future program will continue up to 2027**, involving SME, startups and students in AI training initiatives that are consistently updated to reflect the AI ever-evolving landscape and use cases. Within the HighEST Lab, joint project with the University of Turin, TIM is currently focused on use cases that **exploit AI to support learning for university students**.

TIM is engaged in the national industry association to promote AI to the Italian industry ecosystem with particular focus on SMEs. Periodic updates on AI are delivered by the mean of whitepapers and position papers disseminated within AI roadshows.

VERBUND

On the organisation

Name: **VERBUND**

Size: Large (250 employees or more)

Headquarter: Austria

Sector: Energy

The organisation is a: ☐*Provider*/☒*Deployer* of AI systems

AI system(s) provided and/or deployed:

Productivity Enhancement Tools: Office and coding copilots for daily task automation, VerbundGPT as internal AI assistant

Predictive AI Systems: price forecasts, email classification.

On the AI literacy approach

Status: Fully implemented (since beginning of 2024)

Target group: Organisation's staff across all departments and levels.

The initiative is open to all employees across our organisation. While the primary audience consists of **office-based staff**, we regularly see participation from various levels including leadership, technical experts, administrative staff, and department heads. To ensure maximum accessibility, all sessions are recorded and made available on our AI Portal. Each session is transformed into multiple formats: the complete video recording with subtitles, a concise text summary, and a 5-minute audio version created using text-to-speech technology. This multi-format approach ensures that employees can engage with the content in ways that best suit their learning style and schedule.

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

Our **"FrAIday" initiative** consists of monthly 50-minute sessions designed to be accessible and relevant for all employees. Each session follows a carefully structured format: a 5-minute introduction showcasing new AI capabilities, followed by a 30-minute presentation from either an external expert or internal speaker, and concluding with Q&A and an engaging quiz. In 2024, we featured both internal speakers presenting our AI tools and practices, as well as external experts, including a collaboration with Women in AI. Topics covered included AI Fundamentals, Prompting Techniques, Bias in AI Systems, Data Protection, AI and Democracy, Critical Infrastructure, Future of Work, Creative Industries, Geopolitical Implications, Healthcare Applications, and Internal AI Tools.

We ensure content is valuable for all knowledge levels by presenting information in clear, non-technical language while including advanced aspects for experienced participants. Each topic is introduced with basic concepts before diving deeper, and speakers use practical examples and real-world applications to make complex topics tangible. Through the Q&A sessions, participants can ask questions at their individual comprehension level, and the interactive quiz helps reinforce learning for everyone. This mix of perspectives and formats helps address different learning needs and interests within our organisation.

How does the practice take into account the context in which the AI system(s) is/are used?

The FrAIday initiative includes special editions focused on AI systems used **within our energy sector** organisation. These sessions address the practical applications and impacts of AI in our work context, helping employees understand AI's role in our field. For 2025, we are increasing our focus on internal AI activities and tools, including technical deep-dives into topics like Large Language Models (LLMs) and Retrieval-Augmented Generation (RAG). The FrAIday initiative is a core component of our AI Centre of Excellence, providing a strong foundation for AI literacy and future training initiatives across the organisation.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The initiative reached **25% of total workforce in just 8 months**, with 1 in 3 office-based employees engaged. We measure success through attendance tracking and post-session surveys. Participants report

that the sessions help them in their daily work and that their time was well spent. The growing number of questions and discussions during sessions indicates higher engagement and deeper understanding of the topics. This has laid solid groundwork for advanced AI literacy initiatives.

Which challenges has the practice addressed and what issues is the organisation still facing?

The practice has successfully made AI accessible to employees across various expertise levels. While the voluntary nature of the program means that some groups remain unengaged, we deliberately maintain this approach as we believe mandatory participation could diminish the inherent appeal and enthusiasm for the topic. Our current challenges focus on **maintaining high engagement levels** and evolving content to keep pace with rapid AI advancements.

Is the organisation planning to change and/or improve the practice?

We plan to continue the FrAIday initiative. For upcoming sessions, we are establishing **partnerships with universities and AI companies** to bring diverse expert perspectives, while increasing our focus on internal use cases and practical applications

III. Planned practices

Milestone Systems

On the organisation

Name: **Milestone Systems**

Size: Large (250 employees or more)

Headquarter: Denmark

Sector: ICT

The organisation is a: ☒*Provider*/☒*Deployer* of AI systems

Type of AI system:

Milestone use AI in daily tasks, this includes tools like GitHub Copilot and other productivity enhancing tools in non-high-risk use cases, used by all employees.

At the same time, Milestone develops AI to make video searchable, actionable, and quantifiable, to derive more value from CCTV cameras and video. According to our current assessment, Milestone's AI systems are considered high-risk for the EU AI Act. Therefore, as proud member of the AI Pact, Milestone commits to follow the requirements set out in the AI Act for high-risk AI systems.

On the AI literacy approach

Status: Planned

Target group: Organisation's staff, i.e., all employees. The practice account for all gender identities, ethnic groups and people with disabilities (see below).

How does the practice take into account the technical knowledge, experience, education, and training of the target group?

The practice is made available through our **e-learning platform** in a language and context that every employee can understand and relate to.

The practice includes an **advanced training program for selected employees that are involved in developing AI products**. This training is focusing on requirements from our Responsible Development Policy that again includes requirements from the G7 code-of-conduct. This policy is being adapted towards AI Act High Risk AI requirements and updates to the advanced training program will be made available after this update.

How does the practice take into account the context in which the AI system(s) is/are used?

The basic e-learning training program **is focused on the usage of AI, including risks, as a tool in the daily work**, but not specifically addressing the tasks involved in the development of AI systems. This is addressed in a separate program. Hence, the use and purpose in the basic training program has an outset in daily tasks like **presenting, summarising, or producing information**. The examples are specific for Customer Service, Content Creation and Summarisation, HR, Marketing, IT, Cyber security and Data Analysis. The training also highlights the risk-based approach of the AI Act and the focus on risks, use and purpose.

The **advanced training goes deeper into the requirements from our Responsible Development Policy** based on the G7 Code-of-conduct and will, before august 2025, be updated with requirements from the AI Act for high-risk AI systems with **examples on high risk uses cases from different sectors**, like law enforcement and city surveillance.

What has been the impact of the practice so far and how does the organisation monitor such impact?

The training is planned but not implemented in the organisation. Hence, the impact is not measurable yet, but KPIs will be available when it is fully implemented, and employees are starting to participate in the online training program. Every employee must attend the basic programme before February 2nd 2025.

The advanced training will be rolled out to individual groups of employees depending on their involvement of the development of AI. All employees that are related to the development of our AI-based products will participate on a need-to-know basis.

The quantitative KPIs will come from the participation of the online training while the qualitative KPIs will be based on continuous performance and accuracy metrics, including bias related metrics etc.

Which challenges has the practice addressed and what other issues is the organisation still facing?

Since the practice has not been implemented yet, we have no particular challenge to report.

Is the organisation planning to change and/or improve the practice?

We are not planning to change the practice unless KPIs indicate that the effect is too low.