

Responsible Artificial Intelligence Policy Statement

Introduction

True Corporation is committed to the responsible development, deployment, and use of Artificial Intelligence (AI) in a manner that supports good corporate governance, accountability, human oversight, data protection, security, and compliance with applicable laws and regulations. This Policy Statement forms part of the Company's broader corporate governance framework and should be read together with the Company's Corporate Governance Policy and related governance, risk management, compliance, privacy, and security frameworks.

Governance and Organization

The Company maintains governance and accountability mechanisms for the oversight of AI throughout its lifecycle. Responsible AI is integrated into the Company's existing governance framework and aligned with established business, risk, compliance, privacy, security, and operational governance processes. Roles and responsibilities for AI oversight are assigned through existing governance structures to establish named accountability for AI outcomes and risk decisions. Furthermore, the Company maintains clear procedures to investigate, address, and remediate errors, unintended consequences, or harm caused by AI systems.

Risk Management

The Company defines clear operational boundaries and capability restrictions for AI systems to prevent misuse, unintended applications, or operation outside their intended scope. Higher-risk use cases are subject to enhanced review, oversight, and control measures throughout their lifecycle.

Controls

The Company implements technical, organizational, and operational controls appropriate to the nature, scale, and risk profile of AI use cases. Such controls may include access management, monitoring, accountability mechanisms, auditability, traceability, and robust cybersecurity measures (such as secure coding practices, vulnerability testing, and threat detection) designed to protect AI systems against cyberattacks, unauthorized manipulation, and to guarantee system integrity.

Fundamental Principles for AI-Related Processing

The Company promotes the principles of Privacy by Design and risk-based governance to safeguard personal data throughout the AI lifecycle, from design and development to decommissioning.

AI-related activities are expected to:

- Support legitimate and defined business purposes.
- Use data in a manner consistent with applicable legal and governance requirements.
- Apply data minimization and proportionality principles where appropriate.
- Respect the rights, interests, and reasonable expectations of individuals and other relevant stakeholders.
- Promote responsible and ethical use of technology and data. Provide appropriate transparency regarding AI capabilities, data sources, and limitations, and ensure users are clearly informed when they are interacting directly with an AI system.

Prohibited AI Practices

The Company strictly prohibits the development, deployment, or use of AI systems that engage in unacceptable risk activities, including manipulative behaviors that distort human action, social scoring systems, or unauthorized biometric surveillance, in alignment with international standards such as the EU AI Act.

Automated Processing and Human Oversight

Where AI systems support or influence decisions that may significantly affect individuals, the Company seeks to maintain appropriate human oversight, accountability, and governance. The level of oversight applied should be proportionate to the nature of the AI use case, the level of automation involved, and the potential impact of outcomes. Appropriate review, intervention, escalation, or challenge mechanisms may be implemented where necessary. The Company ensures that AI systems cannot make irreversible or high-stakes decisions affecting individuals without effective human oversight and override authority.

Processes and Technology

Responsible AI considerations are integrated into the design, development, deployment, operation, monitoring, and review of AI systems. The Company promotes the principles of Privacy by Design and risk-based governance throughout the AI lifecycle. Assessments and reviews including active evaluation and testing to identify and mitigate potential sources of bias or discriminatory outcomes may be conducted prior to deployment and revisited where material changes occur.

Implementation and Oversight

The governance, assessment, deployment, monitoring, and review of AI systems are supported by the Company's Responsible AI governance framework and associated operational processes. These processes are intended to support consistent implementation of Responsible AI requirements across the organization while allowing governance measures to be applied proportionately to the level of risk.

Approved by DPO / Corporate Governance and Sustainability Committee / Board of Directors