ARTIFICIAL INTELLIGENCE POLICY

EUROPA EDUCATION GROUP

MARCH 2026

CHANGE CONTROL AND UPDATES

Edition	Date	Sections affected	Description of Change
V. 1.0	May 2025	Original Document	Original Document
V.1.1	May 2026	General update of the document	Updated clauses and sections

CONTENTS

1 INTRODUCTION

This Artificial Intelligence (hereinafter "AI") Usage Policy has been drawn up as an inevitable consequence of the implementation of AI systems.

For this reason, the Europa Education Group, aware of the importance of AI in the improvement and evolution of all types of processes, is committed to leading the integration of these technologies across all its universities and centres.

This policy on the use of AI systems is designed to provide an overview of how AI can be applied effectively and responsibly within the framework of the activities carried out by the EUROPA EDUCATION Group, ensuring that its implementation aligns with ethical values, current regulations and best practices in the sector.

2 RELEVANT REGULATIONS

The development and implementation of AI systems must be accompanied by respect for and compliance with the applicable regulatory frameworks, as well as the respective guidelines and codes of good practice issued by the main national and international bodies.

Therefore, this Policy has been drawn up in accordance with the obligations and guidelines set out in the following legal instruments:

1. Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Regulation), hereinafter referred to as **the "AI Regulation**".
2. *REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (hereinafter, **"GDPR"**).
3. *Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights* (hereinafter "LOPDGDD").
4. *Organic Law 2/2023 of 22 March on the University System (hereinafter, **the "Universities Act"**).*

5. *"Ethical Guidelines for Trustworthy AI"* – Independent High-Level Expert Group on Artificial Intelligence established by the European Commission in June 2018.
6. *"Recommendation on the Ethics of Artificial Intelligence"* – United Nations Educational, Scientific and Cultural Organisation (UNESCO), adopted on 23 November 2021.
7. *"Introductory and technical guidelines on AI regulation"* – Spanish Agency for the Supervision of Artificial Intelligence, adopted in December 2025.
8. *"Code of Ethics on the Use of Artificial Intelligence"* – Government of Andorra, published in August 2024.
9. *"Europa Education Group Code* of *Ethics". Version used*: 7 July 2023
10. Any other applicable regulations, guides or guidelines.

3 SCOPE OF APPLICATION

The scope of application of the AI Usage Policy extends to all individuals and groups comprising the entities that form part of the Europa Education Group (hereinafter, the **"Group"**), regardless of their geographical location or activity.

The scope of application shall extend to all employees, managers, students, contractors, business partners and any other party involved in any of the following processes, listed by way of example but not limited to:

1. **AI development and procurement:** any process involving the design, development and procurement of AI systems or technology-based solutions incorporating AI, including the selection of suppliers and technology partners, who must comply with the standards set out in this Policy.

2. **Implementation and use of AI:** the implementation and use of AI systems or tools in the Group's internal operations, as well as in the products and services provided to customers and third parties, or to students themselves in activities confined to the institution.

3. **Data management:** any activity related to the collection, storage, processing and transfer of data used or generated by AI systems.

4. **Oversight:** the procedures and control mechanisms established to ensure that the use of AI systems is aligned with ethical and accountability principles, and that it complies with all applicable regulations.

5. **Literacy:** this includes AI training and development initiatives aimed at employees to promote understanding and the appropriate use of AI technology, as well as to foster responsible innovation.

6. **Accountability and Transparency**: documentation and reporting tasks that ensure transparency in the use of AI and accountability to stakeholders.

4 AUTHORISED USES OF AI SYSTEMS

The potential uses for which AI tools and systems may be deployed within the scope of the Group's activities will be determined, regardless of their type.

Thus, AI systems may be used for any legitimate purpose that adds value to the Group and contributes to the improvement of educational, administrative, commercial or research processes, provided that these comply with current regulations.

AI systems are intended, by way of example but not limited to, for the following areas:

1) Document and administrative management

AI systems may be used to optimise and automate the Group's document and administrative management processes, including the classification, archiving and retrieval of documents, the processing of academic and administrative files, the management of internal and external communications, and any other task that contributes to the institution's operational efficiency.

2) Commercial purposes

AI may be used for tasks such as student recruitment and retention, market analysis, resource optimisation, personalisation of the academic offering, or any other commercial activity that adds value to the Group.

3) Support for teaching and academic activity

AI systems may be used as a tool to support teaching staff in the preparation of teaching materials, the design of learning pathways and the generation of

educational resources, always under the supervision and at the discretion of the teaching staff.

4) Student assessment and analysis

AI systems may be used for performance analysis and to improve the educational experience through the personalisation of content and learning processes. Any use of AI that directly or indirectly affects student grading or assessment shall be subject to the necessary regulatory and operational safeguards regarding human supervision and the possibility of review and rectification. Furthermore, AI tools may be used for the detection of plagiarism and the preservation of academic integrity, with the requisite guarantees of transparency and information.

5) Product and service development

AI may be applied in the development of new technological solutions that improve the Group's processes and benefit the university community.

6) Research purposes

AI will be used for the development of innovative projects, advanced data analysis and any other purpose that strengthens the institution's scientific and technological output.

Any AI system used within the Europa Education Group must be registered in the corporate inventory of AI systems. Once registered, the system will be analysed and categorised in accordance with the internal risk management procedures established for this purpose, and the necessary measures will be applied depending on the determined level of risk and in accordance with applicable regulations and the guiding principles of this Policy.

5 GUIDING PRINCIPLES

5.1 RESPONSIBLE USE OF AI SYSTEMS

The responsible, professional and ethical use of AI systems by employees and other persons falling within the scope of application of this Policy shall be promoted. In this regard, the use of AI systems must align with the organisation's standards of quality and accountability, limiting their use solely to professional or academic purposes, and avoiding, in all cases, actions that could harm third parties and/or the Group's corporate reputation and public image.

5.2 HUMAN AUTONOMY AND SUPERVISION

It must be ensured that AI systems designed and used as tools to serve people respect the human autonomy of individuals, reserving important decision-making for human control and supervision.

AI systems must not subjugate, coerce, deceive, manipulate, condition or direct human beings in an unjustified manner, but shall be used as tools that enhance, complement and/or empower people's abilities.

5.3 AI GOVERNANCE

To ensure the correct and appropriate cross-cutting implementation of AI systems in the Group's processes and activities, a governance model has been established centred on an Executive Committee and associated technical committees, as well as an internal regulatory framework of policies and procedures. Furthermore, as operational measures for AI governance, internal control mechanisms and systems for the inventory and registration of AI systems have been implemented.

These and other control mechanisms will ensure **responsibility** and **accountability** for the use of AI systems and their results at any stage of the system's lifecycle.

This AI governance model is linked to the Group's procedure for the categorisation, analysis and registration of AI initiatives, whereby every initiative must be categorised according to its nature and level of risk, analysed in terms of its technical,

ethical, legal and operational dimensions, and recorded in the corporate AI inventory.

This inventory constitutes the centralised and up-to-date repository of all AI systems deployed or under development within the Group, and will serve as an essential tool for the exercise of oversight, traceability and accountability by the relevant governing bodies, ensuring alignment with the applicable regulatory framework and the Group's internal policies at all times.

5.4 COMPLIANCE WITH REGULATIONS

Any use or development of AI systems shall be carried out in full compliance with and subject to the provisions of the applicable legal regulations. By way of example, but not limited to: regulations on privacy and data protection, those governing the University's activities, intellectual and industrial property, and any other specific regulations that may apply as a result of the Group's activities.

Failure to comply with the express provisions of the EU AI Regulation may result in the imposition of the following penalties:

- A fine of up to €35,000,000 or up to 7% of its total worldwide turnover for the preceding financial year, whichever is higher, in the event of failure to comply with the prohibition on AI practices referred to in Article 5 of the AI Regulation.

- A fine of up to €15,000,000, or up to 3% of its total worldwide turnover in the preceding financial year, whichever is higher, in the event of a breach of the obligations under Articles 16, 22, 23, 24 and 26; the requirements and obligations of notified bodies; or the transparency obligations under Article 50.

- A fine of up to €7,500,000, or up to 1% of the total worldwide turnover for the preceding financial year, whichever is higher, in the event of the submission of inaccurate, incomplete or misleading information to notified bodies or to the competent national authorities in response to a request.

The regulatory framework for sanctions may be supplemented and developed in any national or sector-specific regulations that are adopted and are equally applicable to the activities of the Europa Education Group.

5.5 TRANSPARENCY AND EXPLANATORY ACCOUNTABILITY

The use and implementation of AI systems must ensure their transparency and explainability, and they must be understandable to users and stakeholders.

The transparency of AI systems must allow for adequate traceability and explainability, making users aware that they are communicating or interacting with an AI system, as well as providing appropriate information about the capabilities and limitations of that system.

In this regard, the following shall be understood:

1. **Traceability** refers to the ability to trace the datasets and processes that lead to the AI system's decision, including those relating to data collection and labelling, as well as the algorithms used, which must be properly documented.

2. For **explainability**, the ability to explain both the technical processes of an AI system and the associated human decisions, which must be presented in a manner that is understandable to users or those responsible for deployment.

5.6 DIVERSITY, NON-DISCRIMINATION AND EQUITY

With due regard for the dignity of all human beings, the development and use of AI systems must be carried out in a manner that includes diverse stakeholders and promotes equal access, gender equality, cultural diversity and inclusion, whilst avoiding discriminatory effects and unfair biases.

This is why this principle must be considered in two areas of application:

1. On the one hand, equity and non-discrimination must be ensured in access to and use of AI systems, adopting an inclusive approach to guarantee that the benefits of AI are accessible to all stakeholders, and, where necessary, taking appropriate measures to adapt the system to the specific needs of users.

2. On the other hand, AI systems must be impartial, ensuring fair treatment that prevents the existence of unfair biases affecting the equality and diversity of individuals. To this end, periodic reviews must be carried out of the algorithms and datasets used in the development and use of AI systems, with the aim of identifying and mitigating any potential risk of negative discrimination of any kind. Those affected by decisions made with the support

of AI systems that they consider discriminatory may request a review through the channels provided for this purpose.

5.7 ACADEMIC INTEGRITY

The Europa Education Group recognises academic integrity as a guiding principle inherent to its educational mission.

The use of artificial intelligence systems does not alter the nature or standards of integrity governing the activities of the educational community: the principles of intellectual honesty, academic rigour and responsibility in authorship must be upheld regardless of the tools used in any process of creation, writing, analysis or research.

In this regard, intellectual and academic responsibility for all work, activities or scientific output always rests with the person who submits it. The use of AI tools does not exempt the author from verifying the accuracy and rigour of the content generated, nor from declaring its use transparently.

5.8 SECURITY AND TECHNICAL ROBUSTNESS

The AI systems implemented within the Group must possess adequate levels of robustness and resilience, ensuring the security of the system and preventing the materialisation of potential risks and harm affecting the physical and/or mental integrity of human beings and their environment, due to the alteration of the system itself or the results generated.

In this regard, the AI system must possess sufficient technical robustness to guarantee its security, that of the AI model and its underlying IT and infrastructure, through the adoption of the necessary and appropriate technical and organisational measures.

5.9 DATA MANAGEMENT AND PRIVACY

The protection of privacy and personal data must be ensured throughout the entire lifecycle of the AI system. Any activity, use, development or training of AI systems requiring the processing of personal data must be carried out in accordance with applicable regulations, as well as the Group’s quality and governance standards.

Furthermore, the quality and integrity of the data must be guaranteed, avoiding errors, inaccuracies or unfair biases, including those that may arise from the training data itself used in the development of AI systems. To this end, the departments responsible for each system shall carry out periodic reviews to detect and correct deficiencies in the quality of the data processed.

5.10 SOCIAL AND ENVIRONMENTAL WELL-BEING

AI systems must be developed and used in a sustainable manner that respects the environment and animal welfare, as well as in pursuit of social benefit and a commitment to progress and a positive impact on society.

To this end, the long-term effects that the development and use of AI systems may have on human beings, society, democracy and the environment must be assessed and taken into account.

5.11 TRAINING AND AWARENESS

Users responsible for developing and using AI systems must be provided with appropriate training on their operation, responsible use and other criteria defined by the Group, taking into account their technical knowledge, experience, education and training, as well as the intended context of use for the specific AI systems.

Awareness-raising campaigns will also be carried out to reinforce users' commitment to the responsible use of AI systems, as well as compliance with the internal standards and procedures established for this purpose.

6 MONITORING AND TRAINING ON COMPLIANCE

The monitoring and improvement of compliance with and interpretation of this Artificial Intelligence Usage Policy shall be the responsibility, in the first instance, of the Ethics and Legal Committee, and, ultimately, of the Executive Committee. Furthermore, they shall be responsible for ensuring compliance, resolving issues relating to its content or doubts regarding its interpretation and application, as well

as receiving reports of potential misconduct, resolving problems and any other matters that may arise within its scope of application.

7 ENTRY INTO FORCE AND REVISIONS

This policy shall apply from the date of its publication and may be reviewed annually or whenever necessary, depending on developments in AI systems, the regulatory landscape or organisational or strategic changes within the Group.

Compliance with this Policy is mandatory for all parties mentioned, and failure to comply may result in the adoption of such measures as deemed appropriate depending on the seriousness of the circumstances.