

# 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 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 so far published 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.*

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## I. Fully implemented practices

### Assicurazioni Generali S.p.a.

#### On the organization

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**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

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**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 organized 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 centers** 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;
- and **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 centers**, 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 digitalization 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 organization

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**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

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**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 specialized 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 equalize 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 organization

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**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

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**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, **diving participants in complete beginners in machine learning and more 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 uses 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,
- formalizing 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 the basis of 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 together. 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

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**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 organization 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

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**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 specialized 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 utilize 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 optimizing data-driven decision processes, thereby strengthening the organizational 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 organization 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 standardized 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.

## OpenSky Data Systems

### On the organization

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**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

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**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 utilize 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 emphasize 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 emphasizing 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, and actively planning several improvements based on participant feedback and emerging trends technology one key area focus is developing specialised modules addressing specific departmental needs, tailoring content to unique challenges faced by each team; additionally aim to incorporate **more interactive elements** sessions through hands-on workshops real-world case studies fostering deeper engagement practical understanding applications involved.

We also plan closer **collaboration with external experts** and organizations 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 organization, 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 organization

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**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 personalized content delivery, affecting millions of users, employees, and communities. Telefónica prioritizes ethical and responsible AI practices and governance models to ensure compliance, transparency, and accountability.

AI systems deployed are used for:

- Customer service optimization:
  - *Aura*: Telefónica's AI-powered virtual assistant offers personalized 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 optimize 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.
- Personalized recommendations:
  - AI models analyze user behaviors 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 personalized 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 analyzing 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 optimize 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 maximizing positive impacts.

## On the AI literacy approach

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**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-centered, 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 or require prior training.

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

**As regards organisation's staff**, in our *AI for All* program, we consider 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) and **with 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 specialized 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 analyzes the labor 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.

For last, as it was 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 optimize 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), digitalization, 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 Compliance 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 commercialization 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 **reduce 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 **standardization and specialization of training**, considering too the possible variety of AI use cases.

## II. Partially rolled-out practices

### Anekanta AI

#### On the organization

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**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

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**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 organization

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**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 synchronization. AI optimizes 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 optimization.

## On the AI literacy approach

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**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** utilizing visualization 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 utilized 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 emphasizes 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 personalized 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 organization

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**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

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**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 organization 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 organization 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.

## Dedalus Healthcare

### On the organization

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**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 optimize 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 organization 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

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**Status:** Partially rolled-out

**Target group:** Top Management, all organisation's staff and, targeted organization'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 organization'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 organized to ensure all employees understand the importance of AI systems, their functionality and application within the organization. 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 specialized areas.

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

Our organization 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 organization operates in. Additionally, recognizing 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 organization.

- **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.

## Gjensidige Forsikring ASA

### On the organization

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**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 utilizes 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 organization. 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

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**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 organization.

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 generalized 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 individualized 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 organizations**. 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 utilizes 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 organization, 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 organization

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**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 organization 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, analyze 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

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**Status:** Partially rolled-out

**Target group:** Organisation's staff

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

- First, it provides broad, company-wide training to **all employees**, focusing on foundational AI knowledge and emphasizing security best practices.
- Second, there is **specialized 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 specialized 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 organized into progressively advanced levels, and in some cases, they diverge into specialized 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 specialized 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 utilization. This continual evaluation allows us to adjust and enhance our training practices, ensuring their ongoing effectiveness and alignment with our organizational 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 organization**. 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, standardized environment to streamline AI adoption and maintain consistency across the organization.

### 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 organization aligned with the latest legislative requirements and best industry standards.

To further strengthen our AI initiatives, we are establishing a **Center 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.

## Studio Deussen

### On the organization

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**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**, recognizing AI's transformative potential in optimizing workflows and fostering creativity.

AI Systems developed and deployed are used for:

- **Content Generation:** Utilizing generative AI models to produce dynamic 2D and 3D assets, audio elements, environments, and narratives within XR experiences. This enables personalized 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, utilizing models like YOLOv8 to analyze 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 analyze 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 analyzes public spaces, it is designed with privacy-preserving measures to ensure that individual identities are not recognizable, 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

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**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-centered 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 optimization, 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. **Personalized 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 emphasizes 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 analyzing 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 emphasize how AI should serve a specific goal—be it optimizing 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: Analyzing 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 organization

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**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 optimization 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 customized 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

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**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 standardization 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.

## III. Planned practices

### Milestone Systems

#### On the organization

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**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

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**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 Summarization, 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 2<sup>nd</sup> 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.