Corporate AI Policy for the ASB Group

Introduction

This AI Policy defines the principles, responsibilities, and processes for the safe, legally compliant, and ethical use of artificial intelligence (AI) within the ASB Group.

Since the ASB Group was founded in 1985—long before the term "compliance" became a buzzword—it has been a fundamental part of our corporate policy to,

- Conducting business with integrity and fairness,
- Taking responsibility for our employees, human rights, and the environment,
- Complying with data protection regulations and the Code of Conduct, and
- Conducting our business in accordance with the applicable laws of the countries in which the ASB Group operates.

This fundamental approach remains the foundation of our actions to this day and is a key factor in ensuring the long-term and sustainable success of the ASB Group in the future. The term "ASB Group" refers to ASB Group GmbH, headquartered in Röhrnbach, and all companies in which the shareholders hold a direct or indirect stake of more than 50%.

This Corporate AI Policy applies globally to all ASB Group locations and, without exception, to all individuals affiliated with the ASB Group: shareholders, executive management, managers, and employees. We expect every individual not only to comply with laws and regulations, but also to adhere to the standards set forth herein and to the values we have established in this Corporate AI Policy and in our guidelines. In particular, all of our managers, given their role as role models, are obligated to actively promote and implement the principles of conduct, requirements, duties, and values set forth in this Corporate AI Policy.

Each individual must measure their actions against these principles of conduct, requirements, and values, and align their behavior with them. They serve as the binding foundation for our daily actions.

Röhrnbach, June 01, 2026

Christian Binder
shareholder/managig director

Johann Sonnleitner
shareholder/managig director

Karl-Heinz Binder
shareholder

Wolfgang Sonnleitner
shareholder

I. Scope

This policy applies to all employees, departments, and locations, as well as all AI systems deployed or developed, including GPAI (General Purpose AI) and Shadow AI (which refers to the unauthorized, uncontrolled, or covert use of AI tools by employees without the knowledge, consent, or oversight of the IT department or company management).

II. Principles for the Use of AI

Absolute transparency, security, fairness, compliance with data protection regulations, and human oversight are mandatory.

III. Creation of an AI inventory

All systems must be recorded in a central inventory. The responsible persons are listed in Section XV.

IV. Risk classification under the EU AI Act

Risks must be classified into the categories "Not Permitted," "High Risk," "Limited Risk," and "Minimal Risk."

V. Documentation requirements

This includes the technical description, risk management, testing, validation, human oversight, and logging (the digital recording of a system's activities).

VI. Monitoring & Audits

Regular monitoring, risk reviews, and documentation of changes must be conducted.

VII. Transparency requirements

Users must be aware when they are interacting with AI. There is a labeling requirement for GPAI content (General Purpose AI).

VIII. Privacy Policy

Data usage must comply with the GDPR, and the protection of sensitive data must be ensured.

IX. Prohibited Uses

It is prohibited to use AI tools designed for manipulation and social scoring (behavioral assessment), as well as the uncontrolled use of generative AI for confidential data.

X. Training courses

Employees receive regular training. Attendance is mandatory.

XI. Introduction of new systems

AI may only be used following a risk analysis, classification, data protection review, and approval by human oversight. The responsible persons are listed in Section XV.

XII. Changes

Significant changes must be reported, reevaluated, and documented.

XIII. Sanctions

In the event of a violation of the Company AI Policy, the ASB Group reserves the right to take internal measures. In cases of serious violations, fines under the EU AI Act may be imposed.

XIV. KI-Gouvernance

AI compliance oversight, the Governance Board, and roles and responsibilities are defined. The responsible individuals are listed in Section XV.

XV. Human supervision

Human in the Loop is required for critical decisions. The responsible parties can be reached at datenschutz@asb-group.de.

XVI. Entry into force

Effective June 1, 2026.