

ARTIFICIAL INTELLIGENCE POLICY

1. WHY AN AI POLICY

Artificial intelligence (AI) represents a major strategic lever for innovation, operational efficiency, and value creation. However, the design and deployment of AI systems present specific risks that must be identified and managed, particularly in terms of regulatory compliance, data protection and quality, security, and societal impacts.

The rapid evolution of technology, along with the adoption of the European AI Regulation (AI Act), requires the implementation of structured and proportionate governance. To address these challenges, Crédit Agricole Group launched work in early 2023 to define its internal policy governing the development and operation of AI systems within the Group, ensuring compliance with legal obligations, risk management, and alignment with the Group's values.

This policy, published in its first version in October 2024, is fully part of a responsible artificial intelligence approach. This normative framework is based on the conviction that all AI systems — whether high-risk or low-risk, developed internally or provided by external suppliers — must be developed and deployed in an ethical, transparent, and sustainable manner, placing humans at the heart of decision-making. Crédit Agricole Group integrates the principles of accountability, fairness, and respect for fundamental rights into all its AI projects, while taking into account the potential impacts of AI on society and the environment.

This responsible approach, imposing common rules on all AI systems regardless of risk level, is a differentiating element of Crédit Agricole Group's strategy and aims to strengthen the trust of its clients, employees, and stakeholders in its technological initiatives.

2. THE GROUP AI NORMATIVE FRAMEWORK

Beyond regulatory measures or measures related to the quality of AI systems, the remainder of this document presents some important points of the Group AI Normative Framework.

2.1 Governance Principles

The governance of AI systems within Crédit Agricole Group is based on a clear organisation of roles and responsibilities.



Entities are responsible for compliance with the Group AI Normative Framework and assess the solutions they deploy or use themselves. They define governance adapted to their organisation, in accordance with the rules set by the Group.

Although autonomous in their application, they report their activities to the Group AI Design Authority, and also submit requests for exemptions where applicable.

The Group AI Design Authority is responsible for building the Group AI Normative Framework together with the entities, and for ensuring its proper implementation in coordination with all relevant bodies.

Its main missions are:

- Supporting Crédit Agricole Group entities in implementing the Group AI Normative Framework,
- Processing exemption requests and defining acceptable conditions,
- Monitoring the implementation of obligations by entities,
- Conducting first line of defence (LoD1) controls with entities,
- Reporting on its work to IT governance bodies.

2.2 Data Quality

Data quality is a major foundation for the performance and reliability of AI systems throughout their lifecycle. These requirements apply to all data under the responsibility of Crédit Agricole Group, whether for training and validating models, or for their use in production.

All data used by Artificial Intelligence projects during the training, validation, testing, and inference phases are based on the same overarching cross-cutting principles:

- Quality and integrity to ensure that the data used is representative, relevant, necessary, and sufficient. These checks also help combat data poisoning that could corrupt the models produced,
- Data governance with a clear identification of responsibilities.

This work on data quality, essential to any Data and AI project, also aims to combat biases that could be reproduced or amplified by an AI system. This involves:

- Identifying biases present in the data,
- Implementing mitigation measures adapted to the use case,
- Documenting residual biases.

2.3 AI-Specific Risk Management

Beyond the classification of risk levels regarding the health, safety, and fundamental rights of citizens, AI systems may present other risks related to AI technology in other areas: data quality, bias, errors, attacks, operational risks, etc.

In order to better support project owners in identifying the specific risks related to their project, an AI risk taxonomy, aligned with the IT risk taxonomy of Crédit Agricole Group, describes the main risks typically found in Artificial Intelligence projects.

This taxonomy covers both technical risks (data poisoning, jailbreaking, corrupted data, data leakage, etc.) and non-technical risks (legal liability, loss of human expertise, misuse of the AI system, etc.), providing a broad view of the potential impacts of the project.

The risk mitigation measures put in place for the project allow the residual risks of the project to be determined. This AI risk taxonomy remains indicative, as some risks may or may not apply to a given project, and new risks may emerge. With a view to keeping it up to date, the AI risk taxonomy is fed by the R&D work of Group entities, in particular the Group DataLab, and the Trustworthy and Responsible AI Chair in partnership with École Polytechnique.

The identification of specific risks, combined with risk reduction measures, makes it possible to identify the project's AI-specific residual risks.

2.4 Environmental Impact of AI

Every AI system has an environmental impact that must be measured or estimated in order to then be able to reduce it.

There are many optimisation avenues, which can take the form of organisational or technical measures. Some measures are simple to implement, while others, far more complex, may require specialised expertise.

In collaboration between the Group's Sustainable IT and Artificial Intelligence teams, a repository of eco-design best practices has been developed, covering both AI topics and eco-design in general. It is based on the work of Crédit Agricole teams as well as external standards such as AFNOR Spec 2314 "Frugal AI", in which Crédit Agricole Group participated.



Crédit Agricole Group is implementing measures to minimise the environmental impact of its AI systems:

- Measurement and monitoring: The Group is implementing mechanisms to measure, monitor, and reduce the carbon footprint of AI systems in production.
- Alignment with objectives: The carbon footprint must be compatible with the Group's and the project's environmental objectives.
- Technological optimisation: The Group favours technically efficient approaches, optimised models, and low-energy-consumption infrastructures.

2.5 Training and Awareness

Any AI system, however powerful, always depends on the people who use it. This is why Crédit Agricole Group implements training and awareness actions aimed at all employees, with content tailored to each individual:

- Basic training for all employees explaining the fundamental concepts of AI and generative AI, as well as the risks and limitations of AI and the importance of human oversight,
- Methodological training for project teams on the AI Normative Framework and Crédit Agricole Group's rules,
- Technical training for employees designing or maintaining AI systems in production.

3. CONCLUSION

This AI policy reflects Crédit Agricole Group's commitment to a responsible, ethical, and compliant adoption of artificial intelligence. It is regularly reviewed to adapt to the evolution of technology and the regulatory framework, and to incorporate best practices arising from the work of Group entities.

The implementation of this policy is the collective responsibility of all actors within the Group, under the supervision of the appropriate governance bodies.

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