DIGITAL ETHICS GUIDELINES ON ARTIFICIAL INTELLIGENCE OTE GROUP

OTE GROUP OF COMPANIES

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They set the rules that we need for the work of our developers and designers and for when we collaborate with suppliers and partners. The digital ethics guidelines on AI also provide legal certainty when it comes to the handling of AI products and services – i.e. by stating the demand for data privacy and data security measures in data aggregation and processing activities (Big Data) or by expecting AI algorithms used for interpretation and decision making to be flawless (bias free) and tested beforehand.

The digital ethics guidelines on AI mirror OTE Group's understanding of AI and its usage. They represent the framework for our fields of application as well as the manner of application of the AI technology.

Looking at OTE Group's AI guidelines they might seem too plain and simple for such an important and far-reaching topic. To some people they do not hold any greater insights. Nevertheless, each and every guideline has to be seen as a statement and a promise: for taking on responsibility, for transparency, for data privacy, security, for self-determination in terms of data, for consumer protection. In short: they vouch for the values we know and that we expect as a user when interacting with AI products and services, but that we cannot always be sure of being considered.

Our aim is to enable people to self-reliantly use new technologies. Software coders and technicians shall responsibly develop and improve these technologies and we must provide them with an ethical beacon as a

point of orientation. Furthermore, boundaries within which self-learning systems can operate must be defined and initially implemented by developers.

It is about clarity, transparency, security and trust, in summary, it is about the basis for our customers. We represent the key messages of our AI guidelines as a company and in favor of our customers and their trust in us.

To give some examples: the digital ethics guidelines on AI call for a clear definition of who is responsible for which AI system or feature. We commit ourselves to making it clear to the user whether they are interacting with an AI enhanced application. This also results in our understanding of the need to provide a stable and secure basis for data and the infrastructure. Hence, risk and dependency analysis as well as the initial question of why a system or feature shall be developed and whether it caters to a customer's needs are of huge importance. All nine guidelines are illustrated on the following pages.

In a digital world that is being enhanced with AI, each and every human being must be able to self-reliantly and freely decide where and to which extent technology is to support them, and in which situations no AI based service shall help them to accomplish a task. In addition to that, an AI system's results that have an impact on the human being must be comprehensible – especially when the individual is not able to alter the results.

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We believe in the huge potential that lays in artificial intelligence. And we are convinced that this potential can solely be activated and achieved if the use of AI only caters to the human beings' needs while being accepted by society. The development and use of AI must obey ethical values and legal rules, always ensuring the humans' sovereignty. Due to our technical and societal expertise in terms of communication technology, it is our self-defined duty to consider ethical challenges right from the beginning, to deliver answers to these ethical questions and to check whether the answers still hold true in our ever-changing world – continuously.

Yours,

Athanasopoulos George
Dimitriadis Aristodimos

PREAMBLE

Being a trusftul partner and providing the best customer experience are two of the main goals of OTE Group.

As one of the leading ICT companies, it is our responsibility to foster the development of smart technologies, and to emphasize the importance of defined ethical rules that these technologies as artificial intelligence shall follow.

It needs a common understanding on AI to build a correct ethical framework that shall apply to these technologies and their usage. Nowadays, there are different definitions of AI, one of the first being described in the research project proposal made by McCarthy, Minsky, Rochester and Shannon in 1956: 'Every aspect of learning or any other feature of intelligence can in principle be so precisely described that a machine can be made to simulate it.' To us – as to other companies and key players in AI – AI in machines and computer systems imitates the processes and characteristics that mark human intelligence, such as being able to learn, to think logically and to correct oneself.

During recent decades, artificial intelligence has become one of the most intriguing as well as challenging topics of our time. With not only experts, politicians and the public discussing it, AI is prominently placed in our lives. Artificial intelligence starts to have an ever-bigger impact on different aspects of living. It influences the economy by boosting efficiency and generating new fields of business. AI plays a role in society when it comes to broad discussions on subjects such as autonomous cars, 'job generator vs. job killer' etc., showing the effects AI technology can have, and artificial intelligence is seen in our everyday lives, for example as smart speakers with an integrated voice-controlled digital assistant.

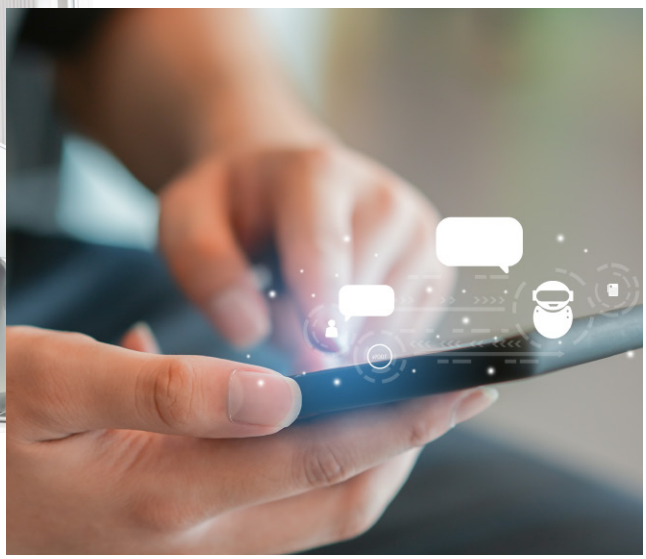
Nevertheless, not only does AI carry chances and possibilities but it also confronts us with ethically

critical situations that never existed before. Ethical principles are based on relationships between human beings as well as traditional values – until now. In this new era in which technology has such a huge impact on our lives, we need to bring these principles up to date to be prepared for the challenges awaiting us.

OTE Group develops and deploys AI technology for the sake of simplifying our customers' lives and to improve their experience and therefore their satisfaction. Meanwhile, we as OTE Group have initiated various projects within the company which work on and with AI. Naturally, this results in an increasing 'digital responsibility', and we must make sure that the ethically correct use of AI stays in focus. In these times, we as OTE Group want to provide answers to our customers, partners, stakeholders and to the public.

In the light of the significant paradigm shift awaiting us, the following digital ethics guidelines on AI shall give advice on how we want to shape the future with AI. To us, technology serves one main purpose: it shall support us human beings. Therefore, AI shall extend and complement a human's abilities rather than lessen them.

General remark: the effects of AI on the job market and tasks within OTE Group (increasing added value by expanding the area of activity or enhancing efficiency) are not discussed in the following guidelines.



AI GUIDELINES

N° 1
We are responsible

The human always remains responsible. Our solutions come with a clear definition of who is responsible for which AI system or feature. We are in charge of our products and services. And, we know who is in charge for partner or third party solutions.

With AI technology being in its infancy, we are aware of our responsibility in development – from the very beginning. We make sure that we clarify which initiative or product owner has which responsibilities. For partners or third parties, we define clear guidelines for when a partnership can be established. And, we declare which duties are connected to the respective AI parts.

N° 2
We care

We act in tune with our company values. Our systems and solutions must subordinate to human-defined rules and laws. Therefore, in addition to our technical requirements, our systems and solutions have to obey the rules and laws that we as OTE Group, our employees – and human beings as such – follow.

AI systems have to meet the same high technical requirements as any other IT system of ours, such as security, robustness, etc. But since AI will be (and already is) a great part of our everyday lives, even guiding us in several areas, AI systems and their usage also have to comply with our comp any values (OTE Group's Guiding Principles and Code of Conduct), ethical values, and societal conventions. We have to make sure of that.

N° 3
We put our customers first

We enrich and simplify our customers' lives. If an AI system or the usage of customer related data helps us to benefit our customers, we embrace this opportunity to meet their demands and expectations.

The aggregation and use of customer data – especially in AI systems – shall always be clear and serve a useful purpose towards our customers. Systems and processes that support in the background are as important as services that interact with our customers directly.

N° 4
We are transparent

In no case we hide it when the customer's counterpart is an AI. And, we are transparent about how we use customer data. As OTE Group, we always have the customer's trust in mind – trust is what we stand for.

We are acting openly to our customers. It is obvious to our customers that they are interacting with an AI when they do. In addition, we make clear, how and to which extent they can choose the way of further processing their personal data.

N° 5
We are secure

Data security is a prime quality of OTE Group. In order to maintain this asset, we ensure that our security measures are up to date while having a full overview of how customer related data is used and who has access to which kind of data.

We never process privacy-relevant data without legal permission. This policy applies to our AI systems just as much as it does to all of our activities. Additionally, we limit the usage to appropriate use cases and thoroughly secure our systems to obstruct external access and ensure data privacy.

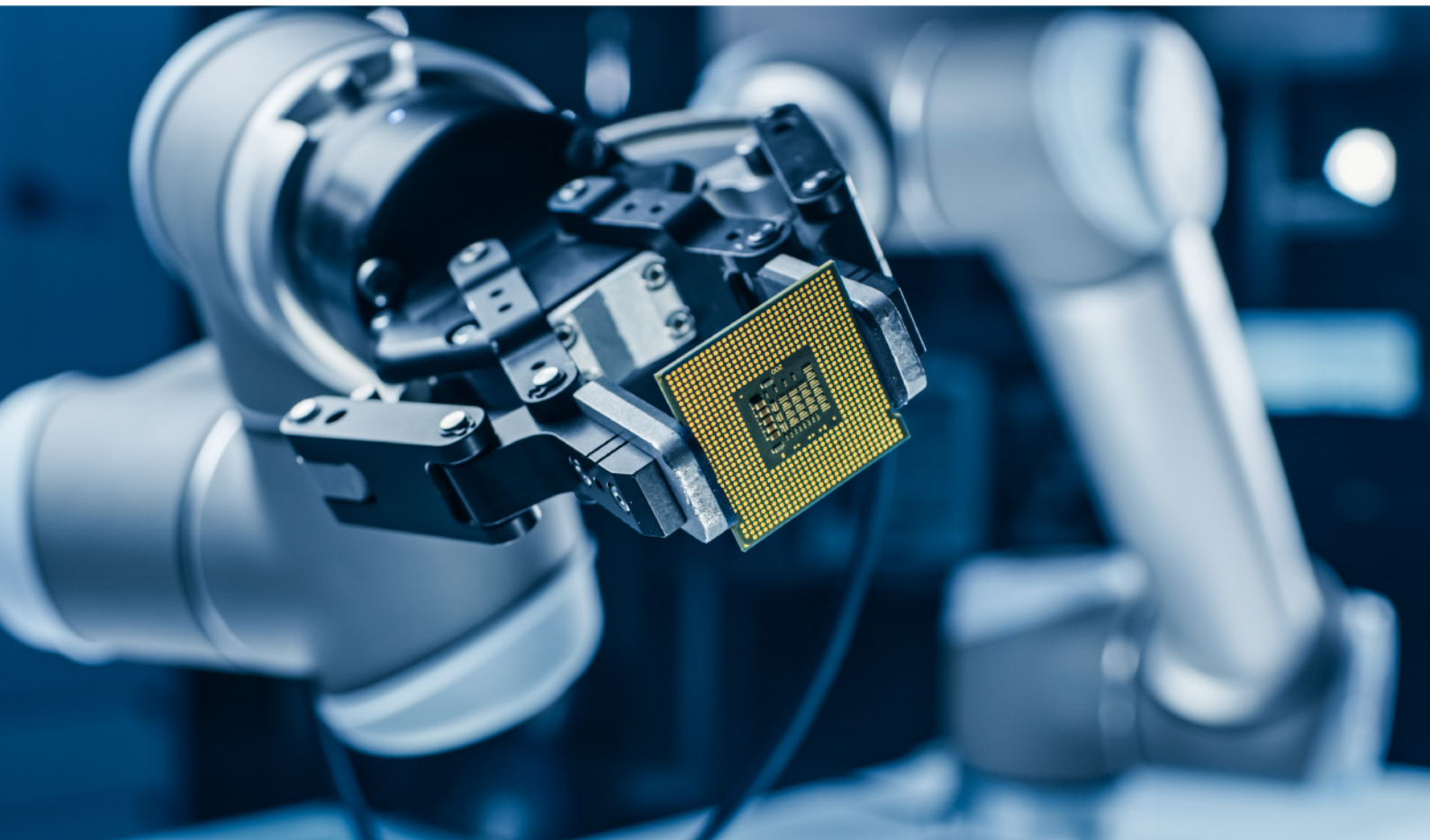
N° 6
We set the grounds

Our AI solutions are developed and enhanced on grounds of deep analysis and evaluation. They are transparent, auditable, fair, and fully documented. We consciously initiate the AI's development for the best possible outcome.

The essential paradigm for our AI systems' impact analysis is "privacy and security by design". This is accompanied e.g. by risks and chances scenarios or reliable disaster scenarios. We take great care in the initial algorithm of our own AI solutions to prevent so called 'Black Boxes' and to make sure that our systems shall not unintentionally harm the users.

N° 7
We keep control

We are able to deactivate and stop AI systems at any time (kill switch). Additionally, we remove inappropriate data to avoid bias. We have an eye on the decisions made and the information fed to the system in order to enhance decision quality.



> HUMANS CAN BENEFIT FROM THE STRENGTH OF AI TO UNFOLD A POTENTIAL THAT NEITHER HUMAN OR MACHINE CAN UNLOCK ON ITS OWN.

We take responsibility for a diverse and appropriate data input. In case of inconsistencies, we rather stop the AI system than pursue with potentially manipulated data. We are also able to "reset" our AI systems in order to remove false or biased data. By this, we install a lever to reduce (unintended) unsuitable decisions or actions to a minimum.

N° 8
We foster the cooperative model

We believe that human and machine intelligence are complementary, with each bringing its own strength to the table. While we believe in a people first approach of human-machine collaboration, we recognize, that humans can benefit from the strength of AI to unfold a potential that neither human or machine can unlock on its own.

We recognize the widespread fear, that AI enabled machines will outsmart the human intelligence. We as OTE Group think differently. We know and believe in the human strengths like inspiration, intuition, sense making and empathy. But we also recognize the strengths of AI like data recall, processing speed and analysis. By combining both, AI systems will help humans to make better decisions and accomplish objectives more effective and efficient.

N° 9
We share and enlighten

We acknowledge the transformative power of AI for our society. We will support people and society in preparing for this future world. We live our digital responsibility by sharing our knowledge, pointing out the opportunities of the new technology without neglecting its risks. We will engage with our customers, other companies, policy makers, education institutions and all other stakeholders to ensure we understand their concerns and needs and can setup the right safeguards. We will engage in AI and ethics education. Hereby preparing ourselves, our colleagues and our fellow human beings for the new tasks ahead.

Many tasks that are being executed by humans now will be automated in the future. This leads to a shift in the demand of skills. Jobs will be reshaped, rather replaced by AI. While this seems certain, the minority knows what exactly AI technology is capable of achieving. Prejudice and sciolism lead to either demonization of progress or to blind acknowledgment, both calling for educational work. We as OTE Group feel responsible to enlighten people and help society to deal with the digital shift, so that new appropriate skills can be developed and new jobs can be taken over. And we start from within – by enabling our colleagues and employees. But we are aware that this task cannot be solved by one company alone. Therefore, we will engage in partnerships with other companies, offer our knowhow to policy makers and education providers to jointly tackle the challenges ahead.

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