

Artificial Intelligence Policy

For the attention of all interested parties

PC Cube Srl, aware of the opportunities and risks associated with the adoption of Artificial Intelligence (AI) and Machine Learning (ML) systems, establishes this AI Policy with the aim of ensuring ethical, transparent, responsible development that complies with applicable regulations, in accordance with the ISO/IEC 9001, ISO/IEC 27001, and ISO/IEC 42001 standards.

The company chooses to develop AI-based systems both for internal use to optimize processes and for selling products and services to its customers, believing AI to be a fundamental resource for corporate competitiveness.

The Management identifies the following principles as the foundation of its Artificial Intelligence Management System (SGAI):

- Compliance with mandatory and voluntary regulatory requirements (AI Act 2024/1689, GDPR, ISO/IEC 9001, ISO/IEC 27001, ISO/IEC 42001)
- Transparency and explainability of models, data, and decision-making processes.
- Ethics and non-discrimination: prohibiting solutions that generate unjustified bias.
- Quality and traceability of data used in training cycles.
- Human controllability & responsibility at all stages of the model lifecycle.
- Continuous improvement through training, monitoring, auditing and periodic review.

Management Commitments

To ensure the implementation of this Policy, the Management undertakes to:

- Integrate the standards defined by ISO/IEC 42001 regarding the development and provision of Artificial Intelligence and Machine Learning systems;
- Assign appropriate roles, responsibilities, and resources (human, technological, training) to the development and management of AI systems.
- Invest in ongoing training on ethics, security, data quality, and ML techniques, making available an internal guideline on the responsible use and development of AI, and periodically assessing staff skills.
- Implement AI usage guidelines that ensure intellectual autonomy and human control over automated decisions.
- Perform AI System Impact Assessment (AISIA) for each new project scheduled for release to production or substantial modification, documenting risks, impacts, mitigations, and go/no-go decisions.
- Ensure segregation of environments (development, test, production), model versioning, and continuous performance logging.

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- Retain technical documentation for at least 5 years and make it accessible to interested parties according to the established authorization levels

As proof of its commitments, PC Cube founded a competence center dedicated to AI research in 2024 and, for 2025, aims to:

- Provide all employees involved in development activities with a training course dedicated to AI development technologies.
- Acquisition of expertise for at least 15 resources in the AI field.
- Use the developed AI tools within reverse engineering projects.

Management periodically verifies that this policy is appropriate to the company's objectives and context, implemented and shared at every level of the organization and with stakeholders, establishing continuous improvement and customer satisfaction objectives. All stakeholders are encouraged to collaborate on PC Cube's AI responsible use and development goals by using the Active Participation channel on the website to submit complaints or to report any negative impacts encountered related to the AI systems developed by the company, and to report any incidents via the dedicated address: [incidenti\[at\]pccube.com](mailto:incidenti[at]pccube.com).

Rome, 12/08/2025

The Management


