Artificial Intelligence Policy (AI Policy)

Policy Owner	VP of Trust
Effective Date	24 November 2026

Advisory Note:

This AI Policy is for information purposes only and sets out the principles, objectives, and commitments that guide FeedbackFruits 's approach to the responsible development, deployment, and management of AI systems. This policy describes the standards FeedbackFruits strives to achieve. They should not be construed as guarantees, warranties, or representations as to any particular outcome, result, or level of performance.

Nothing in this policy is intended to create, or shall be construed as creating, any contractual or other legally binding rights, obligations, warranties, or liabilities. This policy does not form part of, amend, or supplement any agreement between FeedbackFruits and its customers, partners, users, or any other party, and no rights can be derived from it. In the event of any conflict or inconsistency between this policy and the terms of a binding agreement, the terms of that agreement prevail.

The AI landscape, including applicable law and the technologies described here, continues to evolve. FeedbackFruits may review, update, or amend this policy at any time without notice, and pursues the commitments set out in it on a reasonable-efforts basis and to the extent technically and organisationally practicable.

1. Purpose and Scope

1.1. Purpose

FeedbackFruits is committed to advancing Artificial Intelligence (AI) responsibly, aligning our initiatives with the core principles outlined in Regulation (EU) 2024/1689 on Artificial Intelligence (hereinafter “EU AI Act”). We commit to developing, deploying, and managing AI technologies in a manner that is ethical, transparent, and beneficial to all stakeholders. This includes a commitment to continuous improvement, risk management, and adherence to all applicable regulations and ethical guidelines. Our policy is designed to ensure the responsible use of AI, emphasising accountability, security, privacy, transparency and fairness across all our AI applications. By integrating these principles into our strategy, we aim to leverage AI for innovation while mitigating potential risks and ensuring the trustworthiness of our AI systems.

1.2. Scope

This policy applies to all aspects of FeedbackFruits 's Artificial Intelligence Management System (AIMS), including our people, processes, and technologies. It encompasses the lifecycle of AI systems from design and development to deployment and decommissioning, ensuring comprehensive governance across our entire AI portfolio. By defining clear roles, responsibilities, and expectations, we establish a robust framework for AI governance that supports our mission and adheres to international standards.

2. AI Policy Commitments

This policy was developed in line with FeedbackFruit’s strategic direction of empowering educators with proven learning designs. FeedbackFruits is actively leveraging AI technologies to enhance operational efficiency, innovation, and stakeholder value, in alignment with our overarching mission. We are continuously promoting ethical, transparent, and responsible AI use, thereby fostering trust and integrity in all our AI endeavors. This commitment is integrated into our daily operations and strategic planning, ensuring AI technologies serve our organisational purpose effectively.

FeedbackFruits is maintaining adherence to all relevant legal, contractual, and regulatory requirements governing AI. Our compliance efforts are managed through ongoing monitoring of regulatory requirements and training programs for our staff to ensure they understand and implement these requirements. Compliance is a shared responsibility across the organisation, embedded in our operational practices and decision-making processes.

We are committed to the continuous enhancement of our AI Management System (AIMS), fostering a culture of innovation and learning.

3. Guiding Principles and Processes

At FeedbackFruits , we commit to ethical AI development through 6 guiding principles that ensure our AI systems are responsible, transparent, and aligned with our values and stakeholder expectations.

1. Risk Identification and Mitigation: Take measures to identify, evaluate, and mitigate risks across the AI systems' lifecycle, employing diverse testing methods to ensure systems' safety and security.
2. Patterns of Misuse: Monitor AI systems after deployment to identify and address vulnerabilities, incidents, emerging risks, and misuse, facilitating third-party and user reporting of issues.
3. Transparency: Disclose information on AI systems' capabilities, limitations, and appropriate use domains, enhancing transparency and accountability through our detailed AI Transparency Notes (https://trust.feedbackfruits.com/resources).
4. AI Governance and Risk Management Policies: Develop, implement, and disclose risk-based AI governance, privacy policies, and mitigation measures, ensuring accountability throughout the AI lifecycle.
5. Robust Security Controls: Invest in security controls, including cybersecurity and insider threat safeguards.
6. AI Disclosure: Design our AI systems in such a way that the user is always aware that they are interacting with an AI system.

4. Leadership and Commitment

In order to demonstrate its commitment to ensuring that the AIMS is effectively implemented and continually improved, FeedbackFruits management shall:

- Ensure AI policy and objectives are aligned with the strategic direction of the organization
- Ensure the integration of the AIMS into business processes
- Ensure that the AIMS is sufficiently resourced
- Ensure that the importance of conforming to the AIMS is communicated to stakeholders
- Ensure the AIMS achieves its intended results
- Ensure that personnel contribute to the effectiveness of the AIMS in accordance with their roles
- Ensure that the AIMS is continually improved
- Ensure that key AIMS leaders and managers have visible executive support

In addition, senior management will ensure that this policy:

- Is appropriate for FeedbackFruits
- Provides a framework for establishing AI system objectives
- Includes commitments to meet applicable requirements and to continually improve the AIMS.

5. Responsible Use of AI Systems

FeedbackFruits will ensure the responsible development, provision and use of AI systems. Our approach ensures that the deployment and operation of AI systems, whether developed internally or acquired from third-party providers, are governed by thorough considerations and policies tailored to our unique context. FeedbackFruits is dedicated to identifying and documenting clear objectives to ensure the responsible use of Artificial Intelligence systems within our diverse operational contexts. Recognising that responsible AI development and usage vary across industries and applications, we aim to establish a set of core objectives that reflect our commitment to ethical AI practices. These objectives include, but are not limited to, fairness, accountability, transparency, explainability, reliability, safety, robustness and redundancy, privacy and security, and accessibility.

5.1 Trustworthiness

FeedbackFruits aims to design, develop and validate its AI systems in line with recognised industry good practices and applicable regulatory requirements, including the EU AI Act. We assess the quality and performance of our AI systems before release and review them as part of our ongoing monitoring and validation processes.

5.2. Robustness

We are committed to ensuring AI systems maintain performance under the circumstances of their usage.

5.3. Accountability

FeedbackFruits upholds a strong principle of accountability in the development and deployment of AI systems. We accept responsibility for the outcomes of our AI systems, and ensure that decision-making processes are transparent and that mechanisms are in place for recourse and rectification in the event of adverse impacts.

5.4. Safety

Ensuring the safety of our AI systems is paramount. FeedbackFruits implements safety protocols throughout the development lifecycle of AI systems, from design to deployment. Our focus on safety helps prevent harm to users and the broader community, reinforcing our dedication to responsible AI practices.

5.5. Privacy and Security

FeedbackFruits places a high priority on the privacy and security of the data our AI systems process. Security measures shall protect against unauthorized access, use, or disclosure of data, and shall provide protection against emerging threats including data poisoning, inference, evasion and extraction attacks. We maintain an ISO/IEC 27001:2022 certification, which can be found here in our Trust Center.

Our approach to privacy shall ensure that our partners can control or sufficiently influence what information related to their users can be collected, stored and processed, and to whom that information can be disclosed. See our product privacy policy here.

AI system processing shall adhere to relevant laws and regulations, ensuring that our stakeholders' information is treated with the utmost confidentiality and integrity. User data processed by our AI systems is never used to train, test, or develop third-party AI models.

5.6. Accessibility

We are committed to making our AI systems accessible to all users, including those with disabilities. FeedbackFruits follows principles of inclusive design and usability to ensure that our technologies can be easily used and benefited from by a diverse user base. A number of our AI tools are WCAG 2.2 AA and EN 301 549 compliant.

For more information on the scope, see our Accessibility Report on our Trust Center.

5.7. Reliability

FeedbackFruits is committed to the reliability of our AI systems, ensuring they perform their required functions accurately and consistently across expected conditions and over time. We achieve this through ongoing monitoring and validation processes.

5.8. Controllability

Controllability is a key consideration for the use and development of our AI systems. The AIMS is designed to ensure that AI systems fulfil their intended purposes and achieve their intended results, while humans remain in control of how they are used. FeedbackFruits follows a human-in-the-loop approach: our AI systems are designed to support, not replace, human judgement. AI-generated output, such as feedback suggestions or assessments, is intended to be reviewed, adjusted, or rejected by an educator or other responsible user before it has an effect on learners.

5.9. Explainability

We aim to make the output of our AI systems understandable to the people who use them.

5.10. Transparency

We are committed to the transparency of our AI systems, regularly communicating their design, functionality, and operational parameters to stakeholders. This includes disclosing the nature of data used, the decision-making processes employed, and any limitations of the systems. Our transparency efforts are designed to build trust and ensure stakeholders are well-informed about the AI technologies we deploy. This information is outlined in our Transparency Notes in our Trust Center (https://trust.feedbackfruits.com/resources).

5.11. Bias and Fairness

Addressing bias and ensuring fairness in our AI systems are ongoing commitments. We strive to identify and mitigate sources of unwanted bias, ensuring our AI applications treat all cases fairly and without discrimination.

5.12. Verification and Validation

Verification and validation are integral to our approach, confirming our AI systems are built correctly and perform as intended. We employ a range of methodologies to verify individual components and validate the overall system, ensuring it meets specified requirements and operates effectively in its intended application.

6. Intended Use of the AI system

FeedbackFruits ensures, to the greatest extent possible,, that all AI systems are utilised in accordance with their designated purposes and the accompanying documentation. Our commitment to responsible AI use involves deploying AI systems based on precise instructions and guidelines. Ensuring compliance with intended use:

1. Continuous Monitoring: FeedbackFruits monitors the operation of its AI systems after deployment. We track health indicators (such as availability, errors and response times) and quality indicators of AI output, and combine these with feedback from users and customers, support requests and internal testing. This allows us to detect deviations from expected performance, issues affecting stakeholders or legal compliance, and unintended consequences. Issues found are prioritised and addressed through our regular development process.
2. Communicate Concerns: In cases where the deployment of an AI system as per its associated instructions raises concerns about its impact, FeedbackFruits will promptly communicate these issues to relevant stakeholders for resolution.
3. Documentation: FeedbackFruits shall maintain documentation relating to the deployment and operational phases of AI systems. These records serve as evidence of compliance with intended use and assist in addressing any concerns or inquiries regarding the system's application.

Documentation Retention:

Documentation shall be preserved in line with the AI system's intended use, our data retention policies, and applicable legal requirements. This ensures a transparent audit trail and supports accountability and regulatory compliance.

By strictly adhering to these guidelines, FeedbackFruits demonstrates its dedication to responsible and ethical AI usage. Our policies ensure that AI systems are deployed and operated for their intended purposes, enhancing trust and confidence among users, stakeholders, and regulatory bodies.

Version History

Version	Date	Description	Author	Approved by
1.0	24 November 2026	Initial policy	Simona Jansonaite	Franziska Böhler