

Guidelines.

for the use of artificial intelligence



classification: **internal** | external

The following guidelines focus on tools of generative artificial intelligence (AI).

This is the second version of the guidelines. They reflect the evolving legal and regulatory landscape, in particular the new obligations of the EU AI Act, as well as the practical insights we have gained since the first version of the guidelines.

As AI and its regulatory environment continue to evolve rapidly and new tools and use cases emerge on an ongoing basis, we will continue to regularly adapt and further develop these guidelines in the future.

We are aware that...

1. We **take full responsibility for any content which we publish**, regardless of whether the content was created by a human or is AI generated. This applies in particular (but not limited) to potential **violations of personality rights** and **infringements of copyrights**.
2. Content created **by AI can be wrong, incomplete or biased**.
3. If we take over content from AI tools without putting substantial effort in the creation by ourselves, **we may not own the copyrights to such content**.
4. Any **content and confidential information shared** with the AI tool or generated by it **may be used by the AI tool provider** and could show up in any future thread of any other user if we have not entered into a special company agreement (incl. data processing agreement) with the respective AI provider prohibiting such use.
5. **Source code generated by an AI tool** may include third-party code, potentially be **subject to usage restrictions**, and may pose a **security risk**.
6. We are responsible for what we feed into and how we otherwise use AI tools and must ensure that such use **does not infringe copyrights** (this potentially includes content from freelancers and agencies), **personality rights, data protection laws, confidentiality obligations or any other rights or laws**. We must **adhere to any and all relevant legal and regulatory requirements, such as the EU AI Act**, and also **comply with all applicable internal guidelines**.

Guidelines

- A. AI tools have **certain limitations** and certain results may be incorrect, inadequate, incomplete or infringe copyrights or other rights of third parties. We are therefore obliged to **critically question the output** generated by AI tools, use our own judgement and expertise to verify, review and supplement the information. We make sure we only use AI tools within their use restrictions (e.g., how output may be used).

- B. To ensure transparency and maintain trust, we apply **clear rules** on when external-facing **AI-generated content and AI tools must be disclosed**.

For details and examples, see the **labelling rules in the Annex**.

These labelling rules establish a **minimum standard** across the Ringier Group. Subsidiaries and business units may adopt their own, more detailed or stricter labelling rules, but must ensure that the minimum standard is met.

- C. We must **not put any confidential information, own company secrets** (e.g. strategies, financial data, source codes) **or personal data** of informants, employees, clients or business partners or any other natural persons (including photos, videos etc.) into an AI tool and we limit our input to what is necessary - unless the tool has been **internally approved for use with such data categories**.

For further information of the permitted usage of AI tools, please consult the [Ringier AI Courses](#) on the Ringier Academy.

When we use data of third parties with AI tools or training of AI, we make sure that we are permitted to use it for such purpose, both by law and the contracts that we may have with such third parties.

- D. We do not submit **software code** into an AI tool if the code **is subject to third party rights**. Code that qualifies as a **company secret** may only be entered if the AI tool has been **internally approved for use with such data categories**.
- E. As with any third-party IT tool, projects involving AI technologies (e.g. procurement of a new tool, or permanent integration into our systems), require early coordination with the responsible **Legal, Data Protection, and Information Security Team** to ensure compliance and risk mitigation. Depending on the nature and scope of the project, the following actions may be required:

- Data Protection Impact Assessment (DPIA), if required by your local data protection team.
 - Review of legal documents (e.g. master services agreement, data processing agreements, terms of use) by your local legal department.
 - Review and approval of appropriate technical and organisational measures by the Information Security team.
 - Update of internal documentation such as your company's data privacy policies, user journeys and terms of use, in line with guidance from the local Legal, Data Protection and Information Security teams.
- F. The AI tools and technology that we develop, integrate or use shall be and remain robust, fair and designed to avoid bias and discrimination. Therefore, we regularly review our AI tools, technologies and integrations to identify any detected bias or discriminatory tendencies.
- G. In line with the EU Artificial Intelligence Act, we are committed to raising awareness among our employees about the responsible use of AI. This includes ensuring that relevant staff receive appropriate training with regard to AI.
- H. We do not develop, place on the market, or use AI systems that are prohibited under the EU Artificial Intelligence Act.

If you have any questions about legal issues or data privacy, please contact your local legal or data protection teams.

Annex: Labelling Rules for external-facing Content and AI Tools

1. Scope

These labelling rules apply exclusively to external-facing content and AI tools. They do not apply to internal communications, employee-facing tools, or systems used solely within Ringier.

2. Labelling Requirements

2.1 Editorial/journalistic Content¹

- **AI-generated text:** Must be **labelled if it has not been critically reviewed by a journalist** (e.g. automated weather updates, company reports, or sports summaries).
- **AI-generated visual content** (e.g. images, illustrations, infographics, charts, animations) **videos, and audios:** Must **always be labelled**, even if critically reviewed by a journalist.
- **Human created content** that has only been **supported by AI** (e.g. grammar correction, structural suggestions, traditional photo editing, or translations) **does not require labelling**.

2.2 Non-editorial/journalistic Content²

Non-editorial/journalistic AI content (all formats) is **not subject to labelling, except where** required under Section 2.3.

2.3 Rules applicable to all Content Types (editorial/journalistic and non-editorial)

¹ **Editorial/Journalistic Content:** This refers to content that is created and critically reviewed by journalists and under **editorial responsibility** within media organisations (print or online). It falls under the oversight of a responsible editorial entity or person (e.g. editor-in-chief) and adheres to journalistic standards. Examples include news reports, interviews, editorial commentaries, opinion pieces, investigative journalism, and similar forms of editorial media content.

² **Non-Editorial/Journalistic Content:** This includes any content that does not fall under formal editorial responsibility as defined above. It encompasses a broad range of produced materials, such as content on digital marketplaces, marketing and corporate communications, PR articles, sponsored content, advertising, and AI-generated content used in commercial or product-related contexts. While often created with care and professionalism, such content is not governed by journalistic standards or editorial responsibility.

The following rules apply to **all** content types - whether editorial/journalistic or not:

- **AI-generated content that qualifies as a deep fake** (i.e. synthetic image, video or audio content that resembles existing persons, objects, places, entities or events and would falsely appear to be authentic or truthful) **must always be clearly labelled** as artificially generated or manipulated.
- **Interactive AI systems** (e.g. chatbots, virtual assistants, agents) must clearly **inform users** that they are interacting with an AI tool, unless it is obvious from the context.
- There is **no obligation** to disclose the **specific AI model or tool used**.

3. Form of Labelling

Labelling shall be clear, distinguishable, and accessible, and must be provided at the first interaction or exposure of the customer, user, or reader to AI-generated content or AI tools.

4. Examples of Labelling Requirements

- AI-generated editorial/journalistic content is critically reviewed by a journalist.
→ No label is needed.
- AI-generated editorial/journalistic content is not critically reviewed by a journalist.
→ Label is needed, for example: "The content was generated by an AI tool."
- AI-generated illustration in editorial/journalistic context is critically reviewed by a journalist:
→ Label is needed, for example: "The content was generated by an AI tool."
- Human-created content is published, with AI used only for grammar checking (supportive role).
→ No label is needed.
- Human-created content is translated by AI in another language (supportive role).
→ No label is needed.
- An AI-generated video shows an existing person saying something they never said (synthetic image and voice).
→ Label is needed, for example: "This video was generated using AI."