

Euronext AI Policy

This AI Policy summarizes the company's internal governance framework for the responsible use of Artificial Intelligence (AI). It establishes a structured approach to ensure that all AI initiatives are developed, deployed, and managed in compliance with the Digital Operational Resilience Act (DORA), the EU AI Act, and other applicable regulations. The framework is also aligned with international best practices, including the ISO/IEC 42001:2023 standard for AI management systems.

Euronext's objective is to leverage AI to create business value while safeguarding ethical standards, operational resilience, and stakeholder trust.

Scope and Responsibility

This policy applies to all AI and machine learning activities across the organization, including but not limited to:

- Systems developed internally.
- Solutions procured from third-party vendors.
- AI applications integrated into business processes.
- Data analysis, decision-support, and automation tools.
- Research, development, and innovation projects.
- Pilot programs and proof-of-concept initiatives.

It covers the entire AI lifecycle: from idea generation and use-case evaluation through design, testing, deployment, and continuous monitoring.

Euronext's AI Policy is implemented and facilitated by the Head of Innovation and AI who ensures alignment between the ESG strategy, regulatory obligations, and technological developments.

Objectives

The AI Governance Framework is built on seven core objectives:

- **Responsible AI development** – Ensure initiatives align with Euronext's ethical principles and organizational values
- **Robust risk management** – Identify and mitigate risks through structured assessments at each project stage, including cybersecurity protection
- **Regulatory compliance** – Adhere strictly to GDPR, the EU AI Act, DORA, and other relevant regulations.
- **Clear accountability** – Define governance structures with transparent roles, responsibilities, and oversight mechanisms.
- **Value creation** – Maximize business benefits from AI investments while protecting stakeholders.
- **Continuous improvement** – Integrate learning cycles to refine processes and enhance system performance over time.
- **Transparency and trust** – Build confidence among employees, regulators, partners, and clients through open and responsible practices, including avoiding potential bias in the use and development.

Governance

AI projects at Euronext progress through five phases, each with clear deliverables, evaluation criteria, and approval checkpoints:

- **Use Case Framing** – Define the business problem, expected value, and potential risks.
- **Proof of Concept (POC)** – Test feasibility on a small scale.

- **Risk, Legal & Compliance Assessment** – Evaluate regulatory, ethical, and operational risks.
- **Production Deployment** – Approve and implement the solution in live environments.
- **Periodic Review** – Monitor system performance, risks, and compliance on an ongoing basis.

This phased approach ensures that innovation is enabled, not blocked, while safeguarding compliance and resilience.

The AI Governance Framework is guided by four enablement principles:

- **Support innovation** – Provide clear pathways and expert guidance to accelerate safe implementation.
- **Accelerate safe deployment** – Reduce time-to-market while maintaining safeguards.
- **Mitigate risks effectively** – Apply practical controls to manage risks without stifling innovation.
- **Ensure compliance** – Simplify navigation of regulatory requirements to deliver solutions that meet all obligations.

To oversee this framework, Euronext has established an AI Decision Committee composed of representatives from Risk Management, Compliance, Legal, Information Security, AI and Data Science teams and Business Units (owners of use cases).

The Committee meets bi-weekly or as required to:

- Validate risk assessments.
- Issue go/no-go recommendations.
- Provide tactical decision-making.
- Escalate high-risk or complex matters when necessary.

Conclusion

Through this framework, Euronext commits to developing and using AI in a way that is responsible, transparent, and resilient, ensuring compliance with international standards while enabling innovation and long-term value creation.