

AI POLICY

Northwind People Ltd

Version 3

Owner: Alex Rivera, AI Governance Owner

Effective: 2026-07-01 Review: 2027-07-01

Designed to support alignment with the EU AI Act and recognised AI governance practices. Final obligations depend on the organisation's role, systems, sector, and circumstances. Not legal advice.

§ 1 PURPOSE AND SCOPE

(legal)

Northwind People Ltd uses AI systems to support recruitment, customer service and internal productivity. This policy sets out how we govern the design, procurement and use of AI so that it is safe, transparent, non-discriminatory and compliant with the EU AI Act.

Sources

EU AI Act - Article 1 (AIA-Art-1 - 91% match)

The purpose of this Regulation is to improve the functioning of the internal market by laying down a uniform legal framework for the development, placing on the market, putting into service and use of artificial intelligence systems.....

Guidance - AI Office FAQ — Getting started (AIO-FAQ-1 - 78% match)

Organisations should establish a written AI policy proportionate to their size and risk profile, covering purpose, scope, roles and responsibilities.....

§ 2 AI LITERACY

(legal)

All staff who use, procure or oversee AI systems receive AI literacy training appropriate to their role, covering capabilities, limitations, risks (including bias and hallucination) and this policy. Training is refreshed at least annually and on introduction of new high-risk systems.

Sources

EU AI Act - Article 4 (AIA-Art-4 - 93% match)

Providers and deployers of AI systems shall take measures to ensure, to their best extent, a sufficient level of AI literacy of their staff.....

§ 3 PROHIBITED PRACTICES

(legal)

We do not deploy, procure or develop AI systems that fall within the prohibited practices in Article 5 — including social scoring, exploitative manipulation, untargeted scraping of facial images, and emotion recognition in the workplace or education (outside medical/safety exceptions).

Sources

EU AI Act - Article 5 (AIA-Art-5 - 96% match)

The following AI practices shall be prohibited: (a) the placing on the market, putting into service or use of an AI system that deploys subliminal techniques beyond a person's consciousness.....

Guidance - Commission guidelines on prohibited practices (AIO-PROH-2 - 84% match)

Emotion recognition in the workplace is prohibited except where used for medical or safety reasons and with appropriate safeguards.....

§ 4 HIGH-RISK SYSTEM CONTROLS

(legal)

For AI systems classified as high-risk under Annex III — including our recruitment screening tool — we maintain: a risk management system, data governance for training and evaluation data, technical documentation, automatic logging, transparency information for deployers, human oversight measures, and accuracy/robustness/cybersecurity measures.

Sources

EU AI Act - Article 9 (AIA-Art-9 - 90% match)

A risk management system shall be established, implemented, documented and maintained in relation to high-risk AI systems throughout their entire lifecycle.....

EU AI Act - Annex III (AIA-Annex-III - 88% match)

AI systems intended to be used for the recruitment or selection of natural persons, in particular to place targeted job

advertisements, to analyse and filter job applications and to evaluate candidates.....

§ 5 GENERATIVE AI AND TRANSPARENCY

(legal)

Content generated or substantially modified by AI is disclosed to users and, where technically feasible, marked in a machine-readable format. Staff using generative AI tools follow the acceptable-use rules in Appendix B, including bans on entering personal data, client-confidential information or unpublished financial data.

Sources

EU AI Act - Article 50 (AIA-Art-50 - 92% match)

Providers of AI systems, including general-purpose AI systems, generating synthetic audio, image, video or text content, shall ensure that the outputs of the AI system are marked in a machine-readable format.....

Guidance - ISO/IEC 42001 — AI management system (ISO-42001-6.2 - 72% match)

The organisation shall establish acceptable use rules for generative AI tools including data classification, output review and record keeping.....

§ 6 HUMAN OVERSIGHT

(legal)

Every high-risk system has a named human oversight owner. Reviewers are trained on the specific system, have authority not to use or to override outputs, and record oversight decisions in the AI system log. We do not act on fully automated decisions with legal or similarly significant effect without a meaningful human review.

Sources

EU AI Act - Article 14 (AIA-Art-14 - 94% match)

High-risk AI systems shall be designed and developed in such a way, including with appropriate human-machine interface tools, that they can be effectively overseen by natural persons.....

§ 7 INCIDENT REPORTING

(recommended)

Serious incidents and malfunctions involving AI systems are reported to the AI Governance Owner within 24 hours, investigated, and — where required — reported to the relevant market surveillance authority within 15 days. Near-misses are logged for periodic review.

Sources

EU AI Act - Article 73 (AIA-Art-73 - 87% match)

Providers of high-risk AI systems placed on the Union market shall report any serious incident to the market surveillance authorities of the Member States where that incident occurred.....

§ 8 VENDOR AND THIRD-PARTY AI

(recommended)

AI capabilities from third parties are procured only after due diligence covering intended purpose, training data provenance, evaluations, human oversight guidance, incident history and technical documentation. Contracts require notification of substantial modifications.

Sources

EU AI Act - Article 25 (AIA-Art-25 - 81% match)

Any distributor, importer, deployer or other third party shall be considered a provider of a high-risk AI system for the purposes of this Regulation and shall be subject to the obligations of the provider.....

APPENDIX A - AI SYSTEMS

- **Recruit-AI Screening**

Talentflow · Owner: Head of People

Screens and ranks candidates for open roles from CVs and structured questionnaires.

- **Customer Copilot**

OpenAI (via Azure) · Owner: Head of Support

Drafts replies to customer tickets for human review inside the helpdesk.

- **Marketing Studio**

Internal · Owner: Head of Marketing

Generates marketing copy and imagery variants for internal review.