

Guidance on operationalizing process associated with Risk Categories

FH Risk Management examines risks from the perspective of areas (Risk Categories) where the organization has a responsibility and opportunity to treat, mitigate and/or manage risks. These Risk Categories permit useful grouping of new AAA Systems related risks to individuals, society, and the environment. FH Risk Management contains 13 key Risk Categories.

Operationalizing the process associated with each of the risk categories is a critical step in FH Risk Management. Operationalizing process includes establishing key elements for enhancing approaches to mitigate risk to humans, society and the environment.

The following are the key elements of operationalizing the process associated with each of the risk categories:

- Establishing principles
- Establishing policy
- Deploying Process
- Establishing review, oversight and monitoring mechanism
- Remediation & disclosure

In order to enable easier adoption and understanding, this document details the key aspects to consider in operationalizing the process associated with each of the risk categories.

- Ethics
 - Declaring commitments and processes to maximize risk mitigations in regards to humans and aligned to the Code of Ethics
 - Establishing procedures for handling Ethical Choice in the context of the Code of Ethics
 - Evaluating significant and rapid technological change (adapted or created by the company) that are not aligned to the Code of Ethics
 - Establish sufficient process to evaluate risks associated with ethical choice and data ethics as defined in Code of Ethics
 - Monitoring changes in government policies regarding use of AAA systems
 - Establish mechanism to gather DI&MSF and review decisions made on ethical choice instances
 - Establish monitoring mechanism that can identify changes and gaps in the adoption of Code of Ethics
 - Evaluating sufficient ground truth and functional correctness for AAA systems deployment
 - Establish mechanisms to remediate deviations learnt from model monitoring or AIRS
 - Enable processes to provide sufficient and appropriate disclosures associated with residual ethical risks

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- Bias
 - Declaring a clear stand and approach regarding fairness
 - Drafting policies and guidelines on fairness, and transparency
 - Ensuring legal compliance with equality and anti-discrimination law
 - Establish process to evaluate risks associated with bias including measures to review decisions around fairness
 - Establish monitoring mechanism to identify changes, inconsistencies and gaps in existing approaches of fairness
 - Ensure measures to timely remediation of under representativeness, cognitive and non-response bias
 - Evaluating fairness metrics and outcomes against established metrics, threshold or laws
 - Enable process to provide sufficient and appropriate disclosure associated with bias and fairness
- Privacy
 - Drafting policies and guidelines with reference to privacy according to relevant legal jurisdiction
 - Ensuring legal compliance with privacy and data protection regulations
 - Establishing technical and organizational controls (including process, review and monitoring mechanism) for Data Protection regarding Personal Data, Data Subjects and non personal data
 - Ensure measures to timely response and remediation of instances of privacy breach or privacy exposure
 - Controls and procedures for compliance with the rights of Data Subjects, including communications and access
 - Enable process to provide sufficient and appropriate disclosures associated with privacy
- Trust
 - Declare the approach and principles associated with transparency, accessibility, explainability, safety and sustainability
 - Ensuring ethical, governance or accountability structures to oversee risks associated with AAA systems.
 - Transparency
 - Drafting guidelines associated with transparency and align it with relevant legal frameworks and industry standards.
 - Establish a process to ensure that transparency is embedded into the design, development and deployment of AAA systems.
 - Establish review and monitoring mechanism to identify potential gaps, inconsistencies and deviations from the established process for transparency.

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- Enable process to provide sufficient and appropriate disclosures in exhibiting transparency.
- Accessibility
 - Drafting policy and guidelines associated with accessibility (physical, psychological and social) in alignment with relevant legal frameworks.
 - Establish a process to ensure that accessibility considerations are considered in design, development and deployment of AAA systems with adequate inputs from DI&MSF.
 - Establish a monitoring mechanism to identify deviations from the accepted process/ standards for accessibility.
 - Enable process to provide sufficient and appropriate disclosure and facilities associated with accessibility.
- Explainability
 - Drafting guidelines for interpretability and explainability.
 - Establish process and measures for explainability and explainability+ along with adequate measures to include DI&MSF.
 - Establish review and monitoring mechanism to identify potential deviations from the established process for explainability.
 - Enable process to provide sufficient and appropriate disclosure associated with explainability.
- Safety/ Security
 - Draft guidelines and define safety/ security requirements. Align these guidelines with relevant legal frameworks and industry standards.
 - Establish adequate processes to ensure safety in design, development and deployment of AAA systems.
 - Establish review and monitoring mechanism to identify potential deviations from established processes.
 - Enable process to provide sufficient and appropriate disclosure associated with safety.
- Sustainability
 - Draft guidelines and process for sustainability in design, development and deployment of AAA system
 - Establish review and monitoring mechanism to identify potential deviations from the process
 - Enable process to provide sufficient and appropriate disclosure associated with sustainability
- Evaluating broad market concerns associated with risk of AAA Systems beyond the Company's control significantly reducing demand

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for its services and harming its business, financial condition and results of operations.

- Cybersecurity
 - Overseeing and integrating to organization Security risks and cyber-attacks on AI and autonomous systems that has a significant impact to the organization
 - Protecting against Data Entry Point attack vectors

In addition to establishing the above, there is a need to establish a robust residual risk management, considering external or additional risk management methods, and risk treatment plans including insurance. In addition, the residual risk management shall ensure that Transparency and Disclosure documentation are sufficiently detailed and appropriate to enable users to weigh the use of the system against residual risks.