



Responsible AI policy

Approved:
21 November 2025

1. Objectives

This policy sets out the approach to responsible artificial intelligence (AI) development and deployment across the Naspers group. It applies to Naspers Limited (Naspers) and its subsidiaries (individually, a “Naspers group company” and collectively, the “Naspers group” or “Naspers group companies”).

The objectives of this policy are:

- To ensure that ethical considerations are an integral part of AI development and deployment across our group companies as this is essential to preserve quality and longevity in AI products and their performance, as well as to maintain public trust
- As AI is relevant to merger and acquisition activities, we want to ensure that we invest in companies that apply data science and AI to add social value for consumers, partners and the business and at the same time apply globally benchmarked responsible AI standards, whether set forth in applicable laws, ethical best practices, or voluntary frameworks implemented in the jurisdictions where our companies operate.

2. Accountability

Individual businesses are accountable to develop and deploy AI responsibly within their organisations. CEOs in the group hold ultimate responsibility for the success of their businesses and therefore must demonstrate leadership over how responsible AI is addressed within their organisations.

Each business is responsible for implementing this policy and should designate appropriate stakeholders with responsibility for AI governance within the relevant business.

The group provides oversight and guidance to ensure that activities happen within a responsible AI framework. Group-level support activities are described in section 6 of this policy.

3. Responsible AI guiding principles

Because we recognise that achieving state-of-the-art ethical and responsible AI is a process that never concludes, Naspers group companies strive to develop strong capabilities in this area. The guiding principles we use to inform this ongoing work are:

- **Force for good.** We are committed to ensuring that our AI applications contribute to positive changes in people’s everyday lives and are in line with our vision as a group to invest in and build companies that empower people and enrich communities across the world. In this way, we aim for our AI endeavours to benefit our customers, our company and our stakeholders directly, (while creating benefits for society at large).
- **Technical excellence and robustness.** We strive to ensure that the scientific and technical standards informing research, design and application of our AI products and services are sound, robust and on par with the global best practices.
- **Fairness and inclusivity.** We strive to avoid creating unfair biases and reinforcing or exacerbating existing biases. We ensure that fairness and inclusivity considerations are appropriately incorporated in the development and deployment of AI systems.
- **Accountability and transparency.** The designers of systems have an ongoing duty to appropriately document how they implement these principles, and to monitor and control for performance over time. Furthermore, AI systems and their outputs should be context-sensitive, transparent and explainable to different stakeholders in appropriate circumstances. Where possible, we disclose relevant information regarding the use of AI in non-technical terms to foster trust from individuals and businesses alike.
- **Privacy and security.** Data used to train and deploy AI systems must be proportionate and handled in conformity with applicable data protection laws. We make sure that the AI we develop, use and deploy is designed in a way that minimises known security threats, through appropriate technical and organisational measures.

4. Responsible AI governance operating framework

We expect each of our businesses to implement responsible AI practices in a way that is adapted to its own circumstances, which takes account of these principles, its business model, its size and maturity, the cultures of the countries in which it operates, its compliance obligations, and its human and financial resources.

Our responsible AI operating framework aims to ensure that social and ethical dimensions of AI are integrally included within the product or features development or deployment processes, organised around four key pillars that directly apply to all Naspers group companies:

- **Govern**

Our group companies are expected to specify and announce the governance principles applicable to their own development and deployment of fair and responsible AI in a manner that is reasonably accessible by their users, clients, partners and the public. This might include, for example, publishing a policy compatible with the standards contained in this responsible AI policy on their own websites. Such disclosure should always be adapted to reflect the priorities and focus of the individual companies and should be developed in line with appropriate transparency benchmarks, including this policy.

Should our companies operate in jurisdictions where specific AI laws apply, including but not limited to the European Union Artificial Intelligence Act (EU AI Act), they must ensure that the requirements of such laws are met.

- **Design**

Our group companies are expected to appropriately design for privacy, security, transparency, bias controls, and robustness as an integral part of development and deployment of AI systems and models. This pillar includes pursuing efforts aimed at introducing more explainable and robust models.

- **Monitor**

Group companies are to implement appropriate processes aimed at auditing for accountability, bias and risks implicated by specific AI models. This can be enabled, for example, through adopting tools for bias check as part of model-development practices. Proactive cooperation to monitor across disciplines also helps to pre-empt AI-related risks, analyse the likelihood of harm and to appropriately mitigate for such risks.

- **Train**

All group companies should aim to increase AI literacy, by creating and implementing appropriate AI training programmes. In this context, all employees of Nasp group companies are expected to become well-acquainted with company AI tools and to actively use them as aids in the execution of their work, to drive greater scale, efficiency and quality of outputs.

5. AI and investing

As investing in innovative business models and AI-first companies is part of our investment strategy, we also consider the principles contained in this policy in the context of our acquisitions, investments and partnerships.

6. Group support and monitoring

The group's AI team, in collaboration with its AI and ethics working group, helps to support businesses with their responsible AI implementation, legal compliance efforts, regulatory engagements, AI risk assessments and any AI implications of mergers and acquisitions activity.

The Naspers group AI team provides highly specialised training on several AI themes, including responsible AI. It organises technical and scientific workshops for the community, connects data scientists working on similar initiatives, shares practices, tools and lessons learned across businesses.

To support its board members, executives and management teams, Naspers ensures that responsible and ethical AI is a component of executive training.

The risk committee of the Naspers board of directors reviews this policy and its implementation on an annual basis, as part of its oversight and governance responsibilities.

End-users, consumers and other stakeholders that want to address queries or report concerns related to the implementation of this policy can reach out to Naspers and/or group companies through the communication channels they make available.

For more information about this policy, please contact privacy@prosus.com.