



PhoenixX Artificial Intelligence (AI) Policy

Document Reference: PHX-AI-1.0



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Effective Date: 1 November 2025

Governing Law: Swiss Substantive Law

Dispute Resolution: Zurich Arbitration (Swiss Rules)

Issued By: Agency PhoenixX LLC

Domain: PhoenixX.one Leadership Statement on AI Responsibility

PhoenixX believes that Artificial Intelligence must be developed and used with integrity, transparency, and accountability. AI must always serve people—not replace or manipulate them. We reject the reckless use of AI and enforce a compliance-first governance model to ensure human protection, trust, and fairness across all AI-enabled activities.

Head of Compliance & Risk Management, PhoenixX

Executive Summary

PhoenixX integrates Artificial Intelligence (AI) responsibly to enhance compliance, security, operational quality, and data integrity across digital ecosystems. As a global compliance organization, PhoenixX uses AI to improve risk detection and service efficiency, but always under strict ethical and legal control. AI at PhoenixX is designed to support humans—not replace them—and every AI-enabled process includes mandatory human oversight.

PhoenixX commits to full transparency in AI use and ensures that all AI systems comply with international law, respect human dignity, prevent abuse, and protect fundamental rights. This policy explains how PhoenixX governs AI safely and responsibly.

AI Safety and Platform Responsibility

PhoenixX operates in sectors that include digital communication platforms, user-generated content ecosystems, and remote workforce environments. These industries present unique global risks including online abuse, coercion, identity fraud, human exploitation, and unlawful content distribution. PhoenixX applies enhanced AI safety controls to prevent any misuse of AI for harassment, emotional manipulation, grooming, exploitation, adult content abuse, or trafficking-related activity.

PhoenixX enforces a strict policy: **AI must never be used to manipulate vulnerable individuals, simulate intimate interactions, enable psychological exploitation, or support harmful human behavior.** AI systems that interact with users must comply with PhoenixX's **Human Safety Standard** and are subject to continuous risk audits.

1. Purpose

The purpose of this AI Policy is to establish responsible, safe and legally compliant use of Artificial Intelligence (AI) across all PhoenixX operations. This policy implements enterprise-grade governance aligned with global regulations and ensures AI is developed and used in a way that respects human rights, privacy, and ethical business conduct.



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PhoenixX strictly prohibits the misuse of AI to manipulate, deceive, exploit, or cause harm to individuals or organizations.

2. Scope

This policy applies to:

- All AI systems, automation tools and machine learning workflows used by PhoenixX
- AI integrated into services for clients and partner platforms
- Internal AI tools used by PhoenixX teams
- Third-party AI systems used in cooperation with PhoenixX
- All employees, managers, data teams, engineers, legal staff, vendors and freelancers

3. Legal and Regulatory Compliance

PhoenixX adopts a proactive compliance framework aligned with:

- **EU Artificial Intelligence Act (AI Act) 2024**
- **OECD AI Principles**
- **ISO/IEC 42001 – AI Management System Standard**
- **NIST AI Risk Management Framework**
- **GDPR** (EU Data Protection)
- **US AI Executive Order 14110**
- **UK AI Safety Regulation Guidelines**
- **UNESCO AI Ethics Framework**

PhoenixX applies the highest legal standard when jurisdictions differ.

4. Definitions

- **Artificial Intelligence (AI):** Software that performs tasks requiring human-like intelligence.
- **High-Risk AI:** AI systems affecting compliance, contractual rights, employment, finance or safety.
- **AI Governance:** Processes ensuring responsible AI use.
- **Human Oversight:** Mandatory human supervision of AI-enabled decisions.
- **AI Transparency:** Disclosure when AI-generated content or AI decision-making is used.

5. AI Governance Structure

PhoenixX implements a structured AI governance framework led by:

Role	Responsibility
Board of Directors	Strategic oversight of AI ethics and compliance
Head of Compliance & Risk	Policy enforcement and legal accountability
AI Ethics & Risk Committee	AI system approvals and ethical evaluation
Data Protection Team	GDPR and privacy compliance
Cybersecurity Unit	AI security risk management
Internal Audit	Annual AI compliance audit

6. AI Risk Classification (EU AI Act Aligned)

Risk Level	Description	PhoenixX Policy
Unacceptable Risk	Manipulative, harmful or deceptive AI	Prohibited
High Risk	AI affecting rights, compliance or safety	Allowed with controls
Limited Risk	AI requiring transparency	Allowed with safeguards
Minimal Risk	Productivity automation	Allowed

PhoenixX will **never** deploy AI classified as Unacceptable Risk.

7. Responsible AI Principles

PhoenixX enforces:

- ✓ Human control and decision accountability
- ✓ Explainability – decisions must be traceable
- ✓ Security by design
- ✓ Fairness – no bias or discrimination
- ✓ Privacy-first data handling
- ✓ Transparency when AI is used
- ✓ Ethical integrity

8. Acceptable AI Use

AI may be used for:

- Fraud detection and compliance monitoring
- Workflow automation and optimization
- Quality control and productivity analysis
- Data labeling and classification
- Secure pseudonymization/anonymization

9. Prohibited AI Use

PhoenixX strictly prohibits:

- ✗ Identity deception or impersonation
- ✗ Emotion manipulation or "Loveboy" coercion
- ✗ AI for harassment, exploitation or trafficking
- ✗ Deepfakes without legal basis
- ✗ AI-generated fraud or misinformation
- ✗ High-risk AI without human oversight

10. AI Data Usage and Training Compliance

PhoenixX enforces:

- No use of personal data in AI training without a legal basis
- Full source dataset audit trail (data provenance)
- Training data rights must be contractually secured
- AI datasets must exclude illegal or abusive content
- AI data must follow PhoenixX **Data Provenance & Rights Declaration**

11. AI Transparency

Whenever AI is used, PhoenixX ensures:

- AI must not pretend to be human
- Users must be informed when interacting with AI
- AI-generated content must be reviewable

12. Third-Party AI Vendor Control

External AI tools may only be used if:

- Vendor security is verified
- AI risks are assessed before onboarding
- Data protection agreements exist
- Compliance approval is granted

13. AI Security

PhoenixX requires:

- Access control for AI systems
- Model integrity testing
- Adversarial attack protection
- Audit logs for AI decisions

14. Human Oversight

AI **never replaces human authority**. All AI-assisted decisions must be reviewable by a qualified PhoenixX supervisor.

15. AI Incident Response

All AI-related risks must be reported within **24–72 hours** to:

compliance@Phoenixx.one

PhoenixX investigates AI misuse, security breaches and ethical violations.

16. Enforcement

Policy violations may result in:

- Contract termination
- Legal action
- Arbitration
- Reporting to authorities



17. Legal Effect & Arbitration

This AI Policy is legally binding and forms part of all PhoenixX agreements.

Governing Law: Swiss Commercial Law

Dispute Resolution: Swiss Arbitration Centre, Zurich, 1 arbitrator, English language.

18. Review

This policy is reviewed quarterly.

Approved by:

Head of Compliance & Risk Management

Agency PhoenixX LLC

Contact: compliance@phoenixx.one | www.PhoenixX.one

Approval and Enforcement

This AI Policy – PHX-AI-1.0 is issued by Agency PhoenixX LLC and is legally binding upon all Clients, Users, contractors, subcontractors, data processors and affiliated parties engaging with PhoenixX Systems. This Policy shall be enforced without exception. Use of PhoenixX Systems constitutes unconditional acceptance of this Policy.

Approved by: PhoenixX Compliance & Risk Management

Agency PhoenixX LLC

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This policy includes mandatory arbitration and contractual enforcement provisions.



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Frequently Asked Questions (FAQ)

1. Does PhoenixX use AI to replace human workers?

No. AI at PhoenixX supports human decision-making but never replaces human accountability. All AI systems require human oversight.

2. Does PhoenixX use AI for psychological profiling or manipulation?

No. PhoenixX prohibits any form of manipulative, exploitative or abusive AI use, including emotional targeting, coercion or grooming.

3. Does PhoenixX train AI using personal or private data?

No personal data is ever used for AI training without a clear legal basis and documented consent where required.

4. Which AI regulations does PhoenixX comply with?

PhoenixX adheres to the EU AI Act, GDPR, NIST AI Risk Management, ISO/IEC 42001 and OECD AI Ethics Principles.

5. How is AI monitored for safety at PhoenixX?

PhoenixX operates continuous AI risk assessments, audits and documented governance reviews.

6. Who is accountable if AI causes an incorrect decision?

PhoenixX enforces strict human accountability. AI may never act autonomously without human responsibility.

7. How can I report AI misuse?

Reports can be submitted to: compliance@phoenixx.one— all reports are confidential.

8. Can clients request AI audits?

Yes. PhoenixX offers AI governance transparency upon request for enterprise clients.

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