



AI ETHICS POLICY

Access to Nutrition
Foundation

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1.1 PURPOSE AND SCOPE

This policy outlines principles and guidelines for the ethical use, development, and governance of Artificial Intelligence (AI) within ATNF. As a research-focused and data-driven organization addressing global nutrition and malnutrition, we are committed to ensuring that AI technologies are used responsibly and transparently, respecting the rights and interests of all stakeholders. This policy applies to all employees, contractors, partners, and stakeholders engaged with ATNF's use or development of AI tools, systems, or research. It encompasses both internal applications and external collaborations involving AI.

1.2 GENERAL PRINCIPLES

Transparency and Accountability: We will ensure that the use of AI systems and processes are explainable and transparent to relevant stakeholders, and clearly document and communicate how AI influences decisions, especially when they affect stakeholders or beneficiaries. We will assign clear accountability for AI system outcomes to designated team members or functions and report this to the AI Committee.

Bias Mitigation and Fairness: We will actively identify, evaluate, and mitigate biases in data and algorithms to avoid perpetuating discrimination or inequality. We recognise that outputs from AI systems reproduce existing patterns in its historic training data, and therefore care is required to ensure it does not reproduce existing societal biases. This is particularly important when considering the need for systemic changes in food systems.

We also recognise that many AI models are predominantly trained on Western data and therefore may lead to outputs that reflect Eurocentric and American worldviews. AI generated outputs may therefore underrepresent non-Western countries and cultures, which should be considered when designing research methodologies and writing results.

Privacy and Data Protection: We will adhere to strict data privacy standards, ensuring compliance with applicable regulations (e.g. GDPR, the EU AI Act, and others). We will take a cautious approach to the use of internal/proprietary data in AI tools, anonymize datasets wherever possible, and ensure the confidentiality of information provided by third parties. Additionally, we will conduct rigorous risk assessments before integrating AI into data analytics processes to safeguard privacy and data integrity.

Human-Centric Approach: Human oversight underpins all AI use cases. In all research-based projects, we ensure that humans remain actively involved at every stage, and accountable for the quality and reliability of all work outputs. This includes analysts reviewing and verifying the accuracy, comprehensiveness and impartiality of all AI-generated outputs, and ensuring any final outputs reflect their own ideas, analysis and interpretation of research findings. Furthermore, we are committed to transparently disclosing instances where AI was used in research outputs, reinforcing trust and accountability in our processes.

Sustainability: We will continuously assess the environmental impact of AI technologies and prioritize energy-efficient methods. This can include using independent benchmarks of energy consumption, water usage, and carbon emissions of different AI models, where available. During methodology development, researchers will consider the environmental impacts of AI when considering potential approaches. For day-to-day tasks, colleagues will be encouraged to reflect on whether AI is necessary to complete a task, or whether it could be completed without the use of AI.

Ethics & Integrity: We will always avoid applications of AI that could harm individuals or communities, directly or indirectly. We will ensure AI systems are not used for exploitative purposes or in ways that conflict with our mission of combating malnutrition. This may include using third-party benchmarks of AI companies' ethical policies and practices, when deciding between AI models. Generative AI will not be used to create, alter, or embellish testimonials, endorsements, reviews, case studies, or other representations of individuals' experiences in ways that could mislead audiences regarding their authenticity or origin.

Generative AI may be used to create visual aids, including infographics, diagrams, and other presentational materials, provided that the resulting content is accurate and appropriately reviewed. However, generative AI should not be used to create or alter images that could be perceived as forms of first-hand evidence, such as photographic-style images of people, companies, or food products. We recognise risks that AI-generated images may be perceived as less trustworthy than real images and may conflict with ATNi's focus on driving real-world improvements in people's diets. We will not use generative AI tools for creation or alteration of images that represent primary observed data, such as images of people and food products.

1.3 IMPLEMENTATION GUIDELINES

AI committee: ATNi's AI Committee assesses the ethical implications of AI across projects and partnerships and will conduct regular audits to ensure compliance with this policy and respond to emerging ethical challenges.

ATNi will review proposed and active subscriptions for AI tools, to evaluate whether they represent appropriate value for money. Staff who wish to acquire a new AI tool can be requested to complete an AI Tool Request Form for review by the AI Committee, outlining the purpose and intended use, data types, privacy terms, estimated frequency and scale of use.

Training and Awareness: ATNF provides ongoing training for employees and partners on AI, including bias mitigation, privacy, responsible use of data, and skill development. Relevant training resources will be compiled in a training library for future reference. Information on approved AI tools will be shared with colleagues, along with guidance on when and how alternative AI tools may be used for low-risk personal tasks.

We encourage a culture of ethical reflection and discussion across all levels of ATNF. Managers and project leads are expected to promote good AI practices within their respective teams, and information on appropriate AI practices will be shared with onboarded colleagues. Colleagues will be asked to read the AI policy and provide written confirmation of having done so.

Collaboration with Experts: Where relevant, we will consult with AI (ethics) researchers, technologists, and industry experts to ensure our approaches are informed by the latest knowledge and best practices.

1.4 CONSIDERATIONS AND EVOLVING RISKS

We recognize that current forms of (generative) AI may produce inaccurate, misleading, or biased outputs. ATNF will continue to test AI solutions using a structured, phased approach and conduct rigorous risk assessments before integrating them into research and analytics processes. We will exercise caution when applying AI to sensitive topics or generating insights based on organizational data. AI-generated outputs will always be critically reviewed and will only serve purposes that complement the research process, not for replacing essential human

activities such as generation of study results and analysis. To guide this process, we have a risk assessment tool available to staff to help identify and reflect on the potential risks of proposed AI use cases.

The regulatory landscape around AI is rapidly evolving and may impose additional requirements or restrictions on its use in the future. To ensure compliance and maintain flexibility, we will actively monitor regulatory developments, anticipate potential changes, and avoid over-reliance on AI tools in our work.

We also recognize concerns regarding AI models being trained on copyrighted data. ATNF is committed to following recommended best practices on this issue and will take necessary precautions to ensure that our use of AI aligns with ethical and legal standards.

1.5 COMPLIANCE AND REVIEW

This policy will be reviewed annually or as needed to adapt to advancements in AI technology and evolving ethical standards. Feedback from employees, partners, and stakeholders will be incorporated to ensure the policy remains robust and relevant. We will monitor the impact of AI-generated content and adjust as needed. We ensure compliance through periodic audits and report findings to management.

By following these ethical principles, ATNF commits to the ethical use of AI technologies to improve access to accurate and culturally sensitive information.

1.6 CONTACT

Questions about this policy or concerns regarding AI ethics at ATNF can be directed to the AI Committee at info@atni.org.

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