



• Responsible AI in practice

2025 compay case
studies

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REUTERS/Rula Rouhana

A special thanks to 14 companies we engaged with

We would like to extend our sincere thanks to the inaugural group of companies that actively shared their responsible AI practices with us during AICDI's very first year. They demonstrate distinct leadership and a commitment to transparency on these crucial topics. You can read more below in the company case studies about how these companies are handling the challenges around responsible AI deployment.

This group represents a broad range of countries and sectors, underscoring the collaborative effort behind developing responsible AI practices.



The case studies presented in this section are intended to illustrate practical approaches and experiences shared with the Initiative. Inclusion of a company does not constitute an endorsement, rating, or validation of its overall performance, practices, or products.

All information is derived from company engagement and materials voluntarily provided by participating organisations, supplemented where relevant by publicly available disclosures. The content reflects the information shared at the time of engagement and should not be interpreted as a comprehensive or independently verified assessment.

CASE STUDY 1: TELUS



Diversity and inclusion



TELUS is a communications technology company that uses, develops and conducts AI-related research. In this context, the organisation considers diversity and inclusion in its AI projects and teams developing or implementing AI systems. They also work on ensuring that the systems are adapted for use across diverse national, regional, linguistic, and cultural settings.

TELUS has approached this by incorporating diversity and inclusion considerations in its AI projects. They employ a cross-functional 'purple team' AI testing approach that emphasises the participation of diverse individuals with varying expertise and technical literacy to gain comprehensive insights into any system shortcomings, allowing them to effectively mitigate risks. They also publish an annual research report that captures perspectives on AI from more than 11,000 Canadians and Americans, with special attention to historically underrepresented communities, highlighting the importance of including a wide range of voices to build trustworthy AI.

Additionally, TELUS has worked with PLATO Consulting, an Indigenous-owned software company, to set up an extended purple team and support Indigenous AI workforce capacity and skill-building. The organisation conducts public purple teaming events to engage diverse stakeholders in analysing and assessing the fitness of their generative AI systems. TELUS' Indigenous Advisory Council provides guidance on matters related to AI ethics issues, particularly those affecting Indigenous Peoples. Notably, with guidance from the Council, they expressed concerns that AI-generated images of Indigenous Peoples, such as First Nations, Inuit, and Métis Peoples, may perpetuate stereotypes, inaccuracies, and offensive representations. In response, TELUS publicly committed to not using AI to generate images or art of Indigenous Peoples.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – Diversity and inclusion, questions 2.7, 2.10 and 2.11; TELUS Annual Report¹



CASE STUDY 2: VODAFONE

Data, systems and cybersecurity

As a telecommunications company integrating AI across its products, services and business operations, Vodafone faces several key considerations related to safeguarding the security of the data processed within these systems; and ensuring that the data rights of their end users is upheld. There is also a focus on maintaining the safety and security of the AI systems themselves while also identifying the risks stemming from AI to develop effective mitigation strategies.

To address these areas, Vodafone has adopted a comprehensive set of policies supported by practical organisational measures. Central to this effort is the company's Artificial Intelligence Framework², which dictates that their AI systems must carefully manage customer data in alignment with their privacy commitments and prevailing legislations.



This framework complements Vodafone's global privacy management policy, which focuses on respecting local data protection and privacy laws while setting a baseline for those markets where there are no equivalent legal requirements. The framework also commits to respecting end-users' fundamental rights, which includes

data deletion and control over processing of their data. The framework further ensures that customer data is used in AI systems only when a clear legal basis is established, which inherently supports data subject rights while also showing commitment to protect the security of individuals served by AI.

In practice, Vodafone supports this policy through a well-defined governance structure dedicated to addressing emerging AI risks. An AI Governance Board comprising senior leadership is responsible for AI strategy, policy, and threat mitigation. The Governance Board is supported by the Responsible AI Office which along with their "Secure and Privacy by Design" teams, ensures compliance and ethical use of AI while also addressing new risks as they emerge. Their AI framework is a dynamic document which is regularly reviewed and updated to reflect new products, technological developments, and learnings, ensuring that emerging AI risks are considered and mitigation strategies are developed. The governance model also places focus on multidisciplinary approaches, whereby the company enables collaboration between their internal cybersecurity, legal, and privacy experts to inform its AI risk management strategies. Additional safeguards include pseudonymisation and permission-based use of customer data used in AI systems; and application of general cybersecurity measures to the infrastructure that supports AI data.

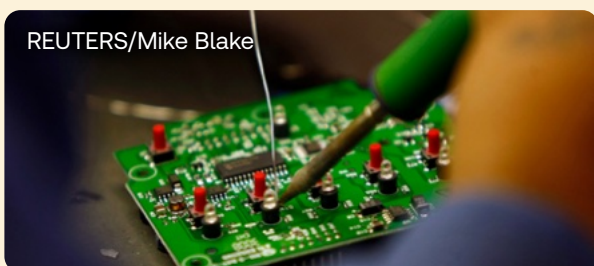
Reference: AICDI (AI Company Data Initiative) 2025 disclosure – Safety & security, Data, questions 3.6 – 3.10; Vodafone AI Framework²

CASE STUDY 3: SAP



Impact on workers

SAP is an enterprise software company. They consider the impact of AI on its workforce by offering training and reskilling programmes that help employees adapt to an AI-integrated workplace. They have also established policies to mitigate potential negative effects of AI systems on workers, provides AI ethics training to key stakeholders, and conducts regular surveys to assess employees' awareness of and engagement with ethical AI practices.



SAP employs a fundamentally human-centric approach to integrating AI into the workplace. They emphasise empowering their workforce rather than displacing it and this commitment is carried out through a robust framework of policies and proactive measures. In practice, the company intentionally designs and deploys its internal AI systems with a “human-in-the-loop” architecture, where AI is used to automate repetitive tasks, provide data-driven insights, and support decision-making — while final judgment, critical thinking, and complex problem-solving remain firmly in the hands of employees. The organisation has a formal AI onboarding process required for every new AI feature. This programme goes beyond standard practice by providing specific materials on the AI system's operation and its impact on user workflows. A significant part of this process is dedicated to SAP's Global AI Ethics Policy, which covers critical

ethical considerations such as fairness, transparency, and human oversight.

SAP has committed to building an AI-integrated workplace through a wide array of training and reskilling programmes. These offerings cater to diverse needs, ranging from foundational AI literacy for all employees to advanced, role-specific curricula. Technical staff receive in-depth training in machine learning, data science, and prompt engineering, while business-focused teams engage in programmes that emphasise the value, application, and ethical implications of SAP's AI solutions, reinforcing the company's Responsible AI principles. The organisation provides comprehensive and mandatory training for all relevant staff, ensuring that its Guiding Principles for AI are deeply embedded across the entire AI lifecycle. The educational framework is designed to equip employees with a thorough understanding of AI's purpose, functionality, and limitations, while clearly defining their ethical responsibilities.

SAP considers AI ethics training a fundamental and mandatory component of its development and operational culture. This training is a required part of the onboarding process for all employees involved in the design, development, deployment, and management of AI systems. They actively and continuously assess the level of AI ethics awareness and practices among its staff through various engagement and feedback mechanisms.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – Impact on workers, questions 2.1 to 2.4, SAP Integrated report³



CASE STUDY 4: TELEFÓNICA

AI governance, strategic & institutional

Telefónica is a multinational telecommunications company that has established AI strategies and guidelines with management oversight and ensures these are accessible to all employees. In addition, Telefónica regularly reviews and updates its governance mechanisms, and engages with industry, regulatory, academic, and civil-society leaders on technological and ethical issues.

Telefónica's AI strategy and guidelines—particularly the Telefónica Artificial Intelligence Principles: AI Code of Conduct—assess the societal impact and potential harms of AI systems beyond direct users. These principles ensure respect for human rights across all contexts in which AI is applied, inherently accounting for broader societal implications. The Responsibility by Design project and the AI Governance Model include processes for assessing risks such as discrimination and bias. Their AI Principles, which were approved by their Board of Directors in 2024, form a core part of their governance approach. Their AI Governance Model is overseen by the Global Compliance Officer through the Digital Compliance & DPO. They also have Responsible AI Champions within their business units to ensure the responsible use of AI. Their company strategy and guidelines on AI involve multiple levels of management and specific roles including the Board of Directors, the Global Compliance Officer, the Global Sustainability (ESG) Office, Responsible AI Office and other specialised teams.

They periodically review and adjust their internal policies, including AI-governance-related internal regulations, where the Regulation of the Governance Model on Artificial Intelligence is subject to review and updates by the Global Compliance Officer.

Policies are generally reviewed on a two-yearly basis or as needed. The review involves stakeholders such as the Board of Directors, its various committees (Audit and Control; Sustainability and Regulation), the Global Compliance Officer, and relevant management areas (e.g., Global Sustainability (ESG) Office, Digital Security, General Secretary, Chief Data Office, Global Technology Officer, and the Digital Innovation unit). Feedback from these reviews—along with emerging risks, regulatory changes (e.g., the EU AI Act), and lessons learned—is integrated to make necessary adjustments to AI governance.

Telefónica ensures that its AI strategy and guidelines are accessible to employees and encourages their review through various means, including Training and Awareness programmes, Internal Policies, and other internal channels.

The company actively engages in technological and ethical exchanges with various leaders by collaborating with international bodies such as the EU AI Office, UNESCO, and GSMA. Through the International Chamber of Commerce of Spain, Telefónica is involved in the UN Global Digital Compact, which focuses on mitigating AI risks for all consumers and users—especially the most vulnerable—demonstrating the company's consideration of broader societal impacts. They additionally take part in OECD's AI working and expert groups, contributing to discussions on AI governance and best practices.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure –AI governance - strategic and institutional, questions 1.3 to 1.8; Telefónica Annual Report⁴

CASE STUDY 5: BANCO BRADESCO, PRUDENTIAL, BASF, INFOSYS, TELEFÓNICA, TELUS

AI Skills Training

Companies across different sectors employ diverse training and reskilling strategies to prepare their workforce for an AI-integrated workplace.



Banco Bradesco, a financial institution, provides technical training in artificial intelligence, programming, and data science, as well as soft skills, to its employees through a partnership with the tech-focused school, Alura. It also offers a 'digital transformation' programme that covers key topics such as AI agents and leadership in transformation. This programme is designed for employees across different Bradesco business units.



Prudential, a financial institution, offers an 'AI for All' training programme that has educated around 5,000 employees on the power of AI and how it can reimagine their work. This programme provides both technical and awareness-focused AI training. AI skills are part of their structured training programmes, which are delivered through a centralised learning platform, targeting employees across the organisation.



BASF, a diversified chemicals company, has jointly agreed with its workers' councils on a general reskilling programme covering technical, hard, and soft skills. This is complemented by AI-specific training offerings delivered through their Data & AI Academy.



Infosys, an information technology company, offers a range of AI-specific training, including generative AI courses, prompt engineering, and AI applications for business growth. Their curriculum includes GenAI-powered professional skill simulators and content on cloud computing and GenAI technologies developed in partnership with hyperscalers. They have an internal learning platform called Lex, which delivers their training programmes to all employees. Targeted programmes support new hires to ensure they are adept in new skills, existing employees for reskilling, and leadership groups, such as the 'more than 250 women leaders' who completed a specialised certificate course on AI applications.



Telefónica, a multinational telecommunications company, offers general training courses to all employees, providing an overview of AI, the company's code of conduct, and Telefónica's AI governance model. In addition, awareness-raising sessions are conducted for business areas to promote ethical practices throughout the AI lifecycle—from design to deployment—ensuring alignment with applicable regulations, such as the EU AI Act. The company also provides a specialised training programme for Responsible AI Champions who lead AI efforts within each business unit. This programme deepens their understanding of both the technical and ethical aspects of AI, equipping them to advocate for responsible AI practices. To support day-to-day application, Telefónica has published two guides accessible to all employees: the Guide to Generative AI for Employees AI, focused on responsible usage, and the Guide to Responsible AI for Business Areas, which supports the ethical development of AI-based products and services.



TELUS, a technology company, offers multiple types of training to help its employees adapt to an AI-integrated workplace. This includes the Data Steward Certification program, which provides Data Stewards with a customized certification training program that equips them to understand the responsible use of AI through data privacy, security, and governance. TELUS also supports team members in achieving the AI Governance Professional Certification offered through the International Association of Privacy Professionals' AI Governance Professional certification. Additionally, the organisation provides ethical machine learning training. The Data & Trust Office includes resources trained in ethical machine learning techniques, demonstrating specialized technical training for AI-related roles. In addition to tailored training for specific job functions, TELUS runs a Data & AI Literacy program for all team members to upskill and understand the opportunities, governance, and risks of data and AI use.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – AI training, question 2.1

CASE STUDY 6: GRUPPO TIM, BASF, TELUS, TELEFÓNICA

Environmental considerations

Across industries, companies are adopting a variety of strategies to monitor and reduce the environmental impact of the AI systems they develop or deploy throughout the AI lifecycle. As AI models become more complex and computationally intensive, their energy consumption—particularly during training and inference—can contribute significantly to an organisation’s carbon footprint. To address this, companies are increasingly considering environmental impacts across the AI lifecycle, including model design, datacentre energy use, cooling efficiency, and the carbon intensity of electricity sources.



Gruppo TIM, a telecommunications company, references its “Verso una Greener AI” article, which recognises that AI systems consume significant amounts of energy, and highlights the need for optimised architectures and infrastructure to reduce this footprint. Since AI systems require substantial computational resources, Gruppo TIM’s approach to reducing energy and environmental impact applies across the full AI lifecycle - design, development, deployment and operation. By sourcing renewable energy and improving energy efficiency, the organisation reduces the operational footprint of AI inference and training. The company works to ensure that data-intensive services, including AI, are delivered more sustainably by monitoring eco-efficiency indicators related to data traffic and infrastructure. Additionally, by investing in lower-energy infrastructure such as fibre networks and better cooling systems, they address environmental impact from the design and infrastructure side of the lifecycle. The company has committed to achieving 100 per cent renewable electricity by 2025, sourcing energy from renewable sources and investing in on-site electricity generation.



BASF, a diversified chemicals company, continuously monitors the energy and CO₂ emissions associated with its internal AI use through its cloud subscriptions. They have determined that the energy and CO₂ impact of this AI use is currently negligible compared with their overall electricity consumption and corporate carbon footprint. The company is also increasing the share of renewable electricity in its total energy consumption and is using AI to reduce both energy use and CO₂ emissions. To support these efforts, the organisation trains machine-learning models on historical and simulated data, enabling its production plants to operate more efficiently within defined limits.



Thomson Reuters Foundation/Fabio Cuttica



TELUS has established environmental sustainability as a foundational pillar of AI development through its Sovereign AI Factory in Rimouski, Quebec – Canada’s first fully sovereign AI facility. The factory is powered by 99 per cent renewable energy in a LEED Gold certified data centre, reflecting a design philosophy that prioritizes carbon reduction while delivering state-of-the-art AI compute infrastructure.

With a Power Usage Effectiveness (PUE) ratio of 1.15, the facility is three times more energy efficient than the industry average for excess power usage with annual energy savings of 10.6 million kilowatt-hours of energy – enough to power 915 households and reduce 329 tons of carbon emissions. TELUS employs innovative natural cooling systems that leverage Canada’s climate, requiring mechanical cooling for only 40 hours per year and operating in free cooling mode 98% of the time. This reduces water consumption by more than 75% compared to traditional data centres — using 0.23 litres per kilowatt-hour versus the industry average of 1.8 litres and saving 17 million litres of water annually. In addition, TELUS utilises an AI-driven energy optimization system to reduce electricity consumption in its data rooms, and it discloses information on its AI use through their annual sustainability reporting, demonstrating an ongoing commitment to transparency regarding environmental impacts.



Telefónica employs a range of environmental and energy-efficiency strategies across the infrastructure that supports its AI systems. These strategies include an energy efficiency plan aimed at reducing overall energy consumption, including that of data centres and networks hosting AI systems; and a renewable energy plan, designed to lower the carbon footprint of all operations, including that of AI systems powered by its infrastructure.

Through its EcoSmart Services, the company works to reuse network and customer equipment, reducing the need for new manufacturing and thereby lowering the embodied energy and environmental impact of the hardware that AI systems run on.

Telefónica monitors the environmental risks of AI systems through its AI governance tool, ensuring that sustainability is assessed throughout the entire lifecycle. Furthermore, it provides training on environmental impact monitoring solutions and has developed its own tool, Kiri, which measures the CO₂ footprint of AI systems and is available to AI solution owners to support mitigation actions.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – environmental considerations, question 1.16

CASE STUDY 7: BANCO BRADESCO, SAP

Review of AI governance mechanisms

Companies employ a range of approaches to reviewing and updating their AI-related governance mechanisms. As AI technologies advance rapidly, regular review processes help organisations ensure that their systems continue to comply with emerging regulations, identify and mitigate emerging risks, and uphold ethical standards across the AI lifecycle. These governance mechanisms ultimately help organisations maintain the reliability and integrity of their AI systems as both internal needs and the external landscape continue to evolve.



Banco Bradesco, for instance, maintains a defined review cadence to ensure the continued relevance and effectiveness of its key AI directives. Its Generative AI Framework is updated quarterly to integrate the latest technological developments and platform enhancements. The Corporate AI Policy undergoes a formal annual review to ensure alignment with the evolving regulatory landscape and ethical commitments. Additionally, the overarching Corporate AI Strategy is continuously assessed by executive leadership to ensure its alignment with strategic business goals and market dynamics.



REUTERS/Thomas Peter



SAP has an AI governance framework that undergoes a comprehensive review on a biannual basis, ensuring strategic alignment and thorough assessment. This is supplemented with provisions for ad-hoc reviews, which may be triggered by new regulatory developments, significant technological shifts or the launch of high-impact AI initiatives. The review process is closely integrated with key stakeholders across the organisation. Strategic oversight is provided by the steering committee, including top management, which convenes biannually. Quarterly reviews are held with management from various business and technology domains to maintain cross-functional alignment. Additionally, an operational AI steering committee, composed of technical experts and project leads, meets monthly to address tactical challenges and monitor ongoing performance. Feedback and insights from all reviews are systematically channelled to the designated process owners and subject matter experts responsible for the AI governance framework.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – Review of AI governance mechanisms, question 1.5



China Daily via REUTERS

CASE STUDY 8: CEMENTOS ARGOS, BASF

Workers' rights

As companies increasingly adopt AI-enabled processes, safeguarding employees from unintended harms—such as unjust monitoring or biased decision-making—has become an essential part of responsible AI governance. As a result, companies are beginning to embed human-rights-based safeguards and governance structures into their AI deployment processes, including consultation with employee representatives, transparent communication, and assessments of potential impacts on worker well-being. To look at how companies ensure that AI tools used in the workplace do not infringe on workers' rights, this section highlights the approaches taken by Cementos Argos and BASF.



Cementos Argos, a conglomerate, has a human rights policy and a commitment to labour practices that guide its actions in protecting the human rights of both internal and external stakeholders. These policies and commitments form the foundation of all company policies, including those related to Artificial Intelligence, which has ethics as its foundation and prioritise people's safety and well-being.



BASF ensures that each use case of AI tools and the systems in which they are implemented is in alignment with employee representatives. The company also monitors and assesses data processing activities to ensure rightful processing of personal data.

Reference: AICDI (AI Company Data Initiative) 2025 disclosure – Worker's rights, question 2.5

Endnotes

- 1 TELUS Corporation. (2025). 2024 annual report: Leading with purpose, innovating with passion. <https://assets.ctfassets.net/>
- 2 Vodafone Group Plc. (n.d.). Artificial intelligence framework. <https://www.vodafone.com/~ /media/Files/V/vodafone/corp/documents/investors/vodafone-artificial-intelligence-framework.pdf>
- 3 SAP SE. (2025). SAP integrated report 2024. <https://www.sap.com/integrated-reports/2024/en.html>
- 4 Telefónica, S.A. (2025). Annual accounts 2024: Consolidated information. <https://www.telefonica.com/en/shareholders-investors/financial-reports/annual-report/>

Responsible AI in practice

2025 compay case studies

Artificial intelligence (AI) is rapidly being embedded across companies' products, services and internal operations, yet governance and disclosure are not evolving at the same speed. This report looks at corporate practice in the context of the emerging responsible AI regulatory landscape and analyses publicly available data collected by the Thomson Reuters Foundation's AI Company Data Initiative, the largest global dataset of corporate responsible AI disclosures. As privately developed or deployed AI systems shape more of daily life, transparency must move beyond technical descriptions to show how accountability works— including who makes decisions, how ethical issues are escalated, and what remediation paths exist when things go wrong. Clear responsibility for harms or breaches should be identifiable in practice, not just in principle. Just as we expect openness and accountability from government, it is important that the private sector meets comparable transparency standards for AI that affects the public.

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