AI ETHICS POLICY

iMerit Group

DOCUMENT DETAILS

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1.0	April 1, 2020	Initial Policy Approved

PURPOSE

iMerit's mission is to provide high-quality tech-enabled data services that leverage human intelligence to power algorithms in Machine Learning (primarily Computer Vision and Natural Language Processing) while creating positive social and economic change. As a service provider to companies using machine learning, the iMerit Group is committed to contributing to the implementation of AI systems that respect applicable laws and regulations, adhere to ethical principles and values and are technically robust. To this end, the iMerit Board Ethics Committee has established a set of guidelines for engaging clients that require AI services and for protecting the rights of iMerit staff in providing such client services.
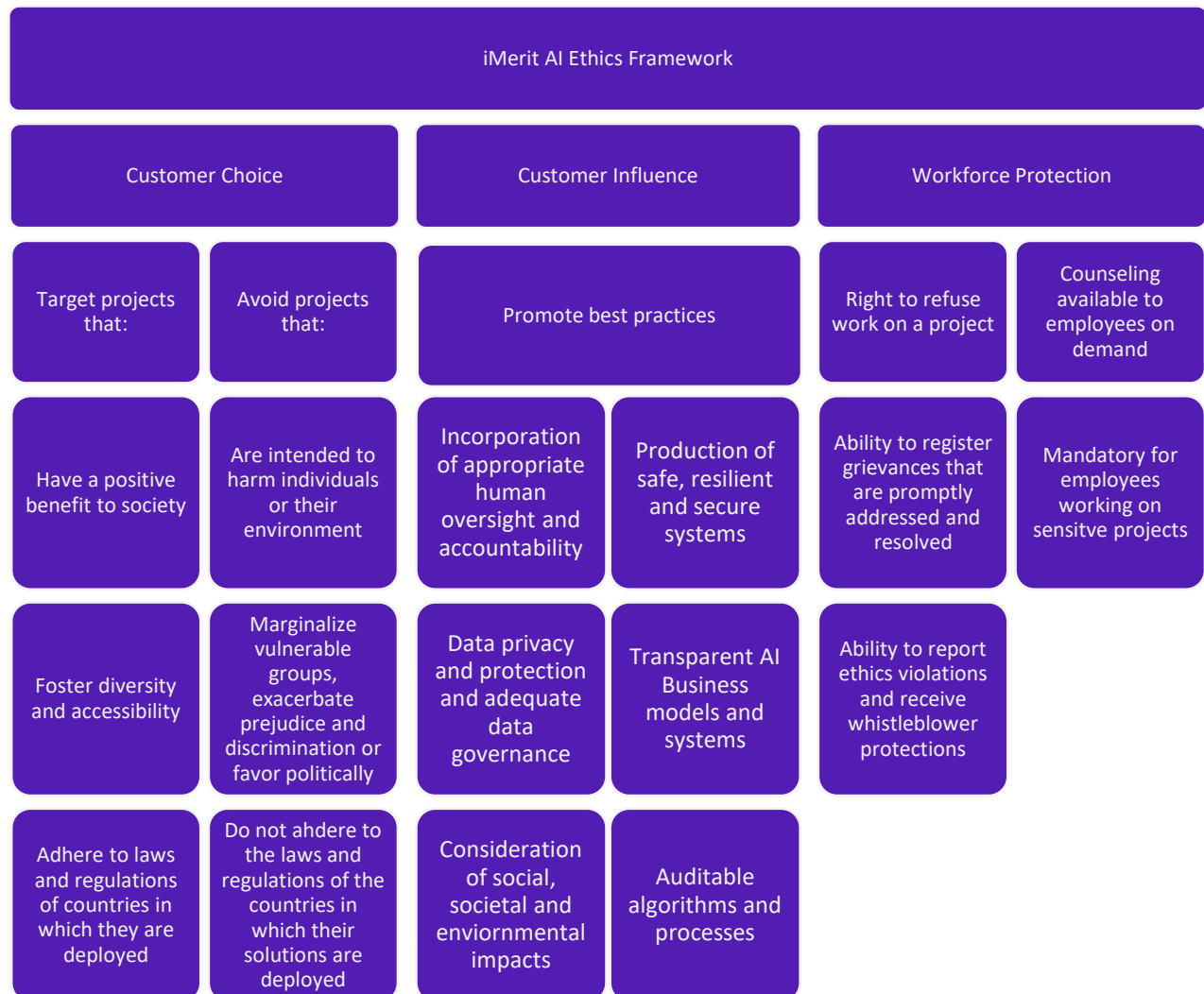
ETHICS FRAMEWORK

iMerit AI Ethics Framework					
Customer Choice		**Customer Influence**		**Workforce Protection**	
Target projects that:	Avoid projects that:	Promote best practices		Right to refuse work on a project	Counseling available to employees on demand
Have a positive benefit to society	Are intended to harm individuals or their environment	Incorporation of appropriate human oversight and accountability	Production of safe, resilient and secure systems	Ability to register grievances that are promptly addressed and resolved	Mandatory for employees working on sensitve projects
Foster diversity and accessibility	Marginalize vulnerable groups, exacerbate prejudice and discrimination or favor politically	Data privacy and protection and adequate data governance	Transparent AI Business models and systems	Ability to report ethics violations and receive whistleblower protections	
Adhere to laws and regulations of countries in which they are deployed	Do not ahdere to the laws and regulations of the countries in which their solutions are deployed	Consideration of social, societal and enviornmental impacts	Auditable algorithms and processes		

Figure 1. iMerit AI Ethics Framework

iMerit's AI Ethics Framework consists of three pillars:

- The first focuses on **customer choice** with the goal of giving preference to client projects that open up opportunities for social and environmental benefits and avoiding those that are likely to harm humans and the environment in which they live,
- The second focuses on **customer influence** with the goal of recommending customers' adoption of AI best practices if and when asked to provide advisory or consulting services to the extent they fall within the scope of such services,

- The third focuses on **the impact of iMerit's projects on the workforce** that provides project services with the goal of protecting rights to raise project concerns, refuse work that conflicts with the cultural norms and values they hold and receive counseling.

As illustrated in Figure 1, iMerit has established a set of principles relative to each of these pillars that guide its choice of customers, the nature of the advice iMerit provides customers, and the protections it offers employees relative to the client projects they work on. These principles are informed by several sources, including the European Commission's Ethics Guidelines for Trustworthy Artificial Intelligence and emerging global best practice.

FRAMEWORK IMPLEMENTATION

POLICY COMMUNICATION AND REVISION

iMerit shall establish a Board Ethics Subcommittee to oversee the implementation of the Ethics Framework. This subcommittee shall be led by an independent Board Director or third party appointed by the Board. Any updates to the iMerit Ethics Policy shall be approved by the iMerit Board Ethics Committee.

iMerit shall appoint a senior member of staff to be responsible for leading the Ethics Framework Implementation.

iMerit's Ethics Policy shall be published on iMerit's external website, be communicated to all employees during induction training and be made available to all employees subsequently through iMerit's intranet-based Information Quality Management System portal.

Each new version of the Ethics Policy shall be introduced to all employee through a web-based communication campaign.

CUSTOMER CHOICE

iMerit requires that Sales when pursuing an opportunity to provide AI services for a client project, review the potential social and environmental impact of the client-project based on available information regarding its purpose and client commitment to building trustworthy AI systems. This review shall result in rating projects on a scale of 1 to 5, where:

- 1 indicates the project is beneficial (the project's stated purpose opens up opportunities to benefit society and the client has demonstrated commitment to the application of AI best practices),
- 2 indicates the project is somewhat beneficial (the project's stated purpose opens up opportunities to benefit society although the client has not publicly committed to the implementation of AI best practices),
- 3 indicates the project is uncontroversial (the project's stated purpose is unlikely to result in harm to humans and their environment)
- 4 indicates the project is somewhat controversial (the project's stated purpose has a high potential to result in harm to humans and their environment even though the customer has publicly committed to the implementation of AI best practices).
- 5 indicates the project is controversial (the project's stated purpose has a high potential to result in harm to humans and their environment and the client has not demonstrated any commitment to the application of AI best practices).

iMerit requires the Head of Sales to be accountable for Sales team judgements. In addition, iMerit requires that Sales ratings of projects be reviewed by an internal AI Ethics Review committee on a monthly basis and that a report of such ratings be provided bi-annually to the Board Ethics Committee for review.

iMerit further requires high risk projects (those rated at level 4 and 5) are immediately surfaced by Sales to the AI Ethics Review committee and those rated at the highest risk level (level 5) are presented to the Boards Ethics Committee for review and approval before entering into a services agreement with the prospective client.

iMerit requires that each Sales Executive receive training in iMerit's AI Ethics policy, project environmental and social risk rating scale, and emerging guidelines, including European Commission Guidelines for Trustworthy AI.

CUSTOMER INFLUENCE

If, in the future, iMerit offers advisory or consulting services to its clients regarding implementation of project AI systems, Delivery Managers tasked with providing such services, shall undertake best efforts to ensure that such advice promotes the adoption of AI best practices and is at a minimum consistent with International standards and principles for the implementation of Trustworthy AI Systems.

The iMerit Delivery Assurance Quality Group shall periodically review the advice provided to clients, identify opportunities to strengthen such advice relative to the promotion of best practices and maintain guidelines for providing such service.

Delivery Managers shall receive periodic training on these guidelines.

WORKFORCE PROTECTION

It is iMerit's policy not to force staff members to engage in delivery of services for Client Projects which conflict with their cultural norms and values. Each staff member shall have the right at any time to decline to work on a project on the grounds that the associated AI Systems or the material they are required to annotate in support of those systems violates their cultural norms or values.

iMerit shall offer counseling to individuals on demand who either refuse to work on those projects or opt to work on them despite the conflict with their cultural norms and values. In addition, iMerit shall provide mandatory counseling for staff members that work on projects with a risk rating of 4 or 5. Such counseling shall include communication of the rationale for iMerit undertaking such projects and provide the opportunity for the staff to provide feedback on ways to minimize its impact on their work. Such counseling shall also include an assessment of the stress level of the staff member being counseled as the result of their work and a recommendation to rotate the staff member when that level is deemed as high.

All iMerit's staff shall have the right to escalate any concerns they have concerning project adherence to the AI Ethics policy through iMerit's standard employee grievance and whistleblowing mechanisms. AI Ethics Policy training shall include a review of these escalation mechanisms and their use in raising project concerns.