



AI Policy

DSB

Department responsible: Artificial Intelligence (AI), DSB IT

Approved by: Board of Directors

Date: 18 December 2025

1. Introduction

AI can have a major impact on our society, and this policy is therefore intended to ensure that DSB takes social responsibility and complies with applicable legislation, in particular the EU AI Act, when using AI.

This places demands on the way we use AI in our daily work and on how we develop and purchase AI systems and models.

2. Purpose

The purpose of this policy is to map out procedures for and ensure that DSB purchases, develops and uses AI in a responsible manner and to establish the framework for how we comply with applicable legislation in this area.

3. Our ambition and targets

It is DSB's ambition to use AI in a proper and responsible way by ensuring:

- that we have sufficient awareness and knowledge of AI, regulatory requirements and the AI Policy and that we are aware of our roles and responsibilities
- that we have established an effective system of governance to ensure compliance with applicable legislation in this area, including by risk-classifying all AI systems and establishing necessary quality assurance measures
- that we pay particular attention to avoiding any intentional or unintentional bias and errors in AI data and systems and in the use of AI
- that we purchase and develop robust, easily explained and correct AI systems offering adequate security (including IT and rail safety)
- that we are transparent to users when we use AI systems
- that we follow up through self-assessment and audit activities, prepare management reports and follow up on these
- that we continuously monitor the performance and quality of our AI systems

4. How we achieve our ambition and/or reach our targets

The Board of Strategic Data is appointed by the Executive Team and is tasked with ensuring compliance with the AI Policy and related guidelines. The Board of Strategic Data is responsible for organising activities that support the policy and for approving risk assessments of AI use across DSB.

In the artificial intelligence department, DSB IT, a function has been established to support the achievement of our goals. It contributes to supporting managers at all levels on a daily basis in complying with the AI Policy and the guidelines.

Managers at all levels of DSB are responsible for complying with the policy at all times, and all employees are responsible for acting in accordance with the policy and guidelines on AI.

5. Impacts, risks and opportunities

DSB will regularly perform risk assessments and risk classification of AI systems and AI models in accordance with applicable legislation.

DSB will continuously assess whether the use of AI systems can and will have an impact on DSB's objectives and guidelines for environmental, social and economic sustainability (ESG).

As one of the criteria for purchasing or developing an AI system, DSB will assess the impact on DSB's ESG objectives.

6. Organisation, responsibility and approval

The Board of Directors of DSB has the overall responsibility for approving the policy and will review it at least once annually.

The AI Policy applies to the entire DSB Group. The policy covers all DSB employees who purchase, develop or use AI systems, whether internal, external, administrative or linked to our train operations.

7. Interaction with other policies and guidelines

The AI Policy interacts with the following other policies of DSB:

- 'Corporate Social Responsibility Policy'
- 'Compliance Policy'
- 'Data Protection Policy'
- 'Data Governance and Data Ethics Policy'
- 'Information Security Policy'
- 'Safety Policy'
- 'DSB's Ethical Guidelines for Suppliers and Business Partners'
- 'Code of Conduct'