



# AI Pact Report

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SAS Institute Inc.

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14 November, 2025

# Report

**Full name, role, and email address of the natural person that has signed the commitments on behalf of the organisation:**

Reggie Townsend, Vice President, Data Ethics,  
[Reggie.Townsend@sas.com](mailto:Reggie.Townsend@sas.com)

**Name of the organisation on behalf of which the commitments have been signed:**

SAS Institute Inc.

**Date of signature of the commitments:**

14 - November, 2024

**Please indicate the commitments you have adhered to, beyond the 'core commitments':**

- Inform deployers about how to appropriately use relevant AI systems, their capabilities, limitations and potential risks;
- Implement policies and processes aimed at mitigating risks associated with the use of relevant AI systems, in line with the relevant obligations and requirements envisaged in the AI Act, to the extent feasible;
- Carry out a mapping of known and reasonably foreseeable possible risks to fundamental rights of persons and groups of individuals that may be affected through the use of relevant AI systems;
- Ensure that individuals are informed, as appropriate, when they are directly interacting with an AI system;
- When deploying relevant AI systems at the workplace, inform workers' representatives and affected workers.

Please illustrate the actions taken by your organisation to demonstrate your commitment to the pledges you have signed:

[CORE] Adopting an AI governance strategy to foster the uptake of AI in the organization and work towards future compliance with the AI Act.

*SAS Actions:*

***Strengthening Leadership & Governance:***

The SAS AI Governance strategy is spearheaded by the AI Oversight Committee (AIOC), which operates with direct executive support. This committee maintains strategic alignment and accountability for AI initiatives across the organization. The AIOC's work is further strengthened by active collaboration with the Data Ethics Practice and the Legal department, integrating ethical, legal, and compliance considerations throughout the AI lifecycle.

***SAS approach to the AI Act***

SAS organized a cross-functional working group, including experienced SAS staff members from various functions and geographies and reviewed our products and practices. The assessment concluded that SAS does not engage in any of the prohibited practices outlined in the AI Act and that no planned initiatives are at risk of violating these practices either.

SAS has also established standard screening practices as part of our Product Development Lifecycle (PDLC) to ensure no new SAS offerings violate AI Act regarding prohibited practices.

- **Restricting Customer Use Cases**  
As a software developer, SAS has not designed any products to perform or enable prohibited practices. To mitigate the potential risk that customers could misuse some of our products for such purposes, our [Acceptable Use Policy](#) and contract terms prohibit customers from engaging in prohibited practices using SAS offerings.
- **General Purpose AI Models (GPAI) and the SAS Generative AI (GenAI) Approach**  
SAS does not create GPAI models like large language models (LLMs) from scratch.

Where SAS has decided to offer features that rely on GenAI, such as SAS Viya Copilot, SAS leverages third-party models from upstream model providers under commercial arrangements or models that are available under permissive licenses (such as open source licenses).

Depending on the feature and use case, SAS may apply fine-tuning to tailor the performance of models to specific use cases. As explained in Recital 109 of the AI Act and the Commission's Guidelines for providers of GPAI models, for providers who have fine-tuned a preexisting model, "the obligations for providers of general-purpose AI models should be limited to that modification or fine-tuning, for example by complementing the already existing technical documentation with information on the modifications, including new training data sources, as a means to comply with the value chain obligations provided in this Regulation." What that means, per the Commission's Guidelines for providers of GPAI models, is that the requirements of the AI's Article 53(1), including documentation, copyright policy, and summary of the content used for training, are limited to the modification. Therefore, where SAS may be a "downstream provider" of a GPAI model under the AI Act based on fine-tuning or other modifications, SAS plans to meet its obligations under the law, including the following:

- **Model Information:** SAS documents basic information about the models SAS leverages, including the model name, input and output modalities, and intended use.
- **Fine-tuning information:** When SAS conducts fine-tuning, SAS documents the aspects under our control at SAS and describe what data was used.
- **Transparency Obligations:** SAS discloses the use of GenAI in features, clearly labeling GenAI-powered features and providing usage instructions and disclosures as needed.
- **Compliance with Acceptable Use Policies:** SAS ensures that SAS adheres to relevant acceptable use policies from upstream model providers and that our legal terms list acceptable use policies relevant to our customers, including those from SAS and from upstream model providers.

- **Copyright Obligations:** SAS maintains a copyright policy aligned with the GPAI Code of Practice, requiring that SAS only use appropriately sourced, lawfully obtained data for model creation, including for fine-tuning of GenAI models conducted by SAS. SAS intends to provide information required by the GPAI Code of Practice.

SAS features that leverage GenAI may also employ techniques such as prompt engineering, retrieval-augmented generation (RAG), or similar techniques that do not fine-tune or otherwise modify an upstream model. Where SAS plays no role in the development of a model and is not the “provider” of a model, SAS will maintain for transparency purposes simplified sets of information regarding these models, make that information available to our customers to the extent it is available from the upstream provider, and document SAS’ use of the models in our documentation.

SAS legal terms prohibit Customers from using SAS models for copyright-infringing uses through SAS’ Acceptable Use Policy: [www.sas.com/acceptableuse](http://www.sas.com/acceptableuse).

For more information please visit:

[https://www.sas.com/en\\_be/trust-center/eu-ai-act/eu-ai-approach.html](https://www.sas.com/en_be/trust-center/eu-ai-act/eu-ai-approach.html)

### ***Strategic Projects:***

To operationalize governance, SAS has launched a dedicated project focused on AI enablement and governance. This initiative provides a structured framework for employees to implement responsible AI practices, monitoring progress, and driving continuous improvement.

**[CORE] Identifying and mapping AI systems likely to be categorized as high-risk under the AI Act.**

*SAS Actions:*

### ***Preliminary Review of SAS Products and Solutions:***

SAS conducted an extensive preliminary review of its existing products and solutions to assess whether any might qualify as high-risk AI systems under the AI Act. The potential for customers to use SAS

platforms to create high-risk AI systems, has been incorporated into our ongoing governance approach.

***Product Development Lifecycle (PDLC) Screening:***

As mentioned above, SAS has integrated a screening process into its Product Development Lifecycle (PDLC). PDLC is a structured process that guides products from initial concept through development, evaluation, and launch. It involves cross-functional collaboration and defined checkpoints to ensure that each product meets organizational standards and objectives. The PDLC supports early risk identification.

**[CORE] Promoting AI awareness and literacy among staff, ensuring ethical and responsible AI development.**

***SAS Actions:***

***Building AI Literacy Across the Organization***

SAS is committed to addressing AI literacy requirements in alignment with the AI Act through a variety of training programs, continuous learning content, and internal resources. Below is a list of initiatives SAS has implemented to help employees and customers meet the AI literacy requirements of the AI Act and contribute to the responsible development and deployment of AI technologies:

- SAS has included AI literacy content in company-wide compliance training designed to ensure that employees are well-versed in the principles of responsible AI development and usage. The content provides foundational knowledge on AI and its ethical implications.
- SAS requires AI-system-specific training for users of certain GenAI productivity tools to ensure responsible use in compliance with the SAS Generative AI Policy.
- SAS offers a Continuous Learning Journey for customer-facing employees on Responsible Innovation. This series of content covers various aspects of responsible AI, including ethical considerations and best practices for innovation.
- SAS disseminates information on AI regulation through internal channels, such as articles, newsletters, and videos that provide insights into navigating new AI regulations.

- SAS provides a range of Responsible AI internal resources to all employees. These resources include guidelines, best practices, and case studies on data ethics and responsible AI.
- The SAS Data Ethics Program (DEP) offers support and advice to employees on integrating ethical considerations throughout the lifecycle of AI systems and promoting a culture of responsible AI practices within the organization. Through DEP, SAS established an AI Ethics Ambassadors program, which aims to promote ethical AI practices
- SAS makes available to its customers and employees a variety of courses on AI and machine learning. These courses are designed to enhance technical skills and understanding of AI technologies.
- The [SAS course on “Responsible Innovation and Trustworthy AI”](#) has been included in the EU AI Office Repository of AI Literacy Practices available online [here](#). This SAS course is external, free and available online, designed for anyone who wants to gain a deeper understanding of the importance of trust and responsibility in AI, analytics, and innovation.

**[NON-CORE] Inform deployers about how to appropriately use relevant AI systems, their capabilities, limitations and potential risks.**

*SAS Actions:*

#### *External Initiatives*

- **Standardized Product Information:**  
SAS applies standardized instructions for intended use and limitations to applicable products as they progress through the PDLC process.
- **Acceptable Use Policy:**  
As noted above, SAS has an [Acceptable Use Policy](#) to ensure that Offerings and all SAS computing resources are used in accordance with established guidelines, protect SAS resources from unauthorized use and misuse, and protect the integrity, availability and confidentiality of data processed by Offerings.
- **GenAI Terms in Contracts:**  
SAS incorporates into customer contracts specific GenAI terms,

which clarify acceptable use, risk boundaries, and compliance requirements for Offerings that leverage GenAI models or services..

### *Internal Initiatives*

- **Policies and Training:**  
SAS has developed internal policies and training programs to ensure responsible use of AI tools, including Microsoft 365 Copilot.
- **Department-Specific:**  
Marketing and R&D teams receive tailored guidance on responsible AI practices, including code generation and communication standards. SAS HR is developing dedicated guidance and resources to support responsible AI practices in workforce-related contexts..
- **Enablement & Playbooks:**  
SAS is developing a comprehensive, company-wide AI enablement playbook that equips teams with practical guidance on responsible AI development, deployment, and oversight. SAS is also creating tailored playbooks for specific departments so that governance principles are effectively translated into day-to-day operations.

**[NON-CORE] Implement policies and processes aimed at mitigating risks associated with the use of relevant AI systems, in line with the relevant obligations and requirements envisaged in the AI Act, to the extent feasible.**

*SAS Actions:*

#### ***Generative AI Policy***

As noted above, SAS has established a comprehensive Generative AI policy to guide the responsible development and deployment of generative AI technologies by SAS associates.

#### ***AI Copyright Policy***

As noted above, SAS has implemented an AI Copyright Policy that is aligned with the AI Act and the GPAI Code of Practice.

### ***New Policies Development***

SAS is continuing to iterate on its AI policies to more broadly address internal AI use as well as give more specific direction regarding AI-enabled offerings.

**[NON-CORE]** Carry out a mapping of known and reasonably foreseeable possible risks to fundamental rights of persons and groups of individuals that may be affected through the use of relevant AI systems.

*SAS Actions:*

#### ***Privacy Protections***

SAS is updating internal review processes to address privacy risks associated with AI systems, including those related to Microsoft Copilot, synthetic data generation, and the personal data of employees.

#### ***Workers' Rights***

SAS management is committed to upholding the rights of employees in the context of AI deployment, and is working closely with SAS HR to implement AI systems in a manner that respects and protects employees. As with other functions within the organization, SAS has not identified use of prohibited practices within HR. Visit our [Trust Center](#) for more information.

**[NON-CORE]** Ensure that individuals are informed, as appropriate, when they are directly interacting with an AI system.

*SAS Actions:*

#### ***GenAI / GPAI Feature Disclosures***

As part of our GenAI and GPAI features, SAS ensures that our internal and customers' users are informed when they are directly interacting with an AI system, such as a chatbot. For more information about GPAI disclosures, please visit the dedicated section on our [Trust Center](#).

**[NON-CORE]** When deploying relevant AI systems at the workplace, inform workers' representatives and affected workers.

*SAS Actions:*

- As noted above, SAS management is coordinating closely with SAS HR to review any proposed AI use and take measures to ensure any such use respects and protects employees.
- An executive level HR representative sits in the SAS AI Oversight Committee.
- When SAS deploys AI systems in the workplace, SAS is committed to engaging proactively and openly with workers' groups and representatives.
  - For example, when SAS deployed Microsoft 365 Copilot (an AI assistant) internally, SAS undertook an extensive pilot phase, spanning several months, during which Microsoft 365 Copilot was introduced to select groups across different business units and geographies. Throughout this pilot, SAS prioritized transparency and collaboration by actively involving workers' representatives in decision-making processes. Regular updates and consultations made it easy to promptly address concerns or suggestions. The pilot also included focused workshops, enablement sessions, and knowledge-sharing initiatives, such as dedicated Teams and SharePoint communities, to support employees in adopting Microsoft 365 Copilot responsibly and effectively. This approach was designed to rigorously test the tool's impact, gather feedback, and ensure that deployment strategies were tailored to local requirements.

**Please highlight significant achievements and success stories related to the voluntary commitments:**

As explained in more detail above, SAS has taken proactive steps to comply with the EU AI Act by confirming SAS does not engage in prohibited practices and embedding screening into its PDLC process. SAS ensures transparency in GenAI features, applies fine-tuning responsibly, and follows a copyright policy aligned with the GPAI Code of Practice. Customer safeguards include an Acceptable Use Policy and contract terms, which are supported by employee training. For more information about EU AI Act compliance, please visit the dedicated section on our [Trust Center](#).

SAS actively monitors for high-risk AI, develops risk management practices, and promotes AI literacy through training and ethics programs. In addition, SAS has undertaken strategic initiatives such as an AI enablement project and an enterprise-wide playbook for

responsible deployment. SAS has also successfully deployed Microsoft 365 Copilot following consultation with Works Councils in EU countries and an extensive multi-month pilot phase across business units and geographies.

**Please illustrate any challenges faced during the implementation process and the lessons learned from overcoming them:**

Balancing the timeline for the law against the uncertainty of the rules was and remains challenging. SAS found it essential to closely monitor the status of the law, regulatory guidance as it is drafted, and related resources such as the GPAI Code of Practice and templates.

SAS learned to provide clarity to R&D teams to the greatest extent while remaining flexible enough for evolving standards. SAS R&D teams found it helpful to use JIRA templates containing distilled guidance from Legal that could be duplicated, reused and then tracked for each new GenAI feature.

**Please outline the next steps and future plans for continuing progress towards fulfilling the commitments:**

In anticipation of the August 2026 regulatory deadline, SAS will prioritize completing assessments and required actions related to high-risk AI systems. This includes refining methodologies for identifying, mapping, and mitigating risks associated with these systems, and aligning practices with the latest standards and guidelines.

The internal AI enablement and governance project will remain a core focus area, with continued development of comprehensive playbooks and policies as well as tailored guidance for specific departments.

Overall, SAS will continue strengthening its AI governance by maintaining current workstreams, updating training and resources, and monitoring emerging risks and regulations. SAS will continue to monitor for updates on guidelines and standards for high-risk AI systems to promote continuous improvement of existing processes. SAS will proactively communicate updates, best practices, and compliance measures, reinforcing trust and transparency in its AI offerings.

