Summary of Key Differences

- SAP's policy is broader and more globally oriented, covering development, deployment, sale, and internal use of AI systems (as expected with a software developer), while City of London's SOP is focused on operational use of GenAI tools by employees and contractors as a customer.

- SAP emphasizes sustainability, multi-stakeholder governance, and global human rights, whereas City of London focuses more on UK-specific legal compliance and operational safeguards, but the two policies are aligned

- SAP has a more formalized governance structure with multiple oversight bodies, while City of London relies on internal notification and approval mechanisms

Outstanding Questions

- Decision from Information Management Board
- IP Ownership confirmation
- How will violations be tracked / prevented

1. Purpose and Scope

Aspect	City of London	SAP	Compliance
Purpose	To guide ethical and compliant use of GenAI tools (e.g., ChatGPT, Bard) by employees and third parties.	To define ethical principles and acceptable use terms for AI technologies across SAP's global operations.	SAP conforms to the same principles as CoL policy re ethical use
Scope	Applies to all users accessing GenAI for City of London Corporation (COL) activities.	Applies to SAP employees, suppliers, and customers involved in the AI system lifecycle.	Consistent

2. Governance and Oversight

Aspect	City of London	SAP	Compliance
Governance Body	Information Management Board must be notified before GenAI use.	AI Ethics Steering Committee, Advisory Panel, Ethics Office, and Trustworthy AI Workstream oversee governance.	Scheduled
Approval Process	Requires notification and justification of data input/output.	High-risk use cases require expert panel review; forbidden cases are blocked.	Meeting scheduled for approval

3. Ethical Principles

Principle	City of London	SAP	Comparison
Lawfulness	Use must comply with UK laws and regulations.	Grounded in UNESCO's AI Ethics principles and global human rights.	SAP complies with UK law as part of the main agreement so is compliant
Transparency	Maximum Transparency by Default (MTbD); public awareness and third-party scrutiny.	Clear documentation, user awareness, and explainability required.	Compliant
Explainability	AI must provide understandable outputs, especially for high-impact decisions.	End-users must be able to request explanations; confidence levels disclosed.	Compliant
Accountability	Named individuals accountable; training required.	Human actors are responsible; governance mechanisms ensure oversight.	Compliant
Bias and Fairness	Must avoid bias and discrimination; risk assessments required.	Fairness and non-discrimination are core;	Compliant

Principle	City of London	SAP	Comparison
		systems tested for bias and equity.	
Security	Technical assessments required before use.	Continuous monitoring and fallback mechanisms for safety.	Compliant (included in main agreement)
Data Sovereignty	UK jurisdiction applies to data created/used in UK.	SAP respects national sovereignty and international law.	Compliant (note that data is hosted in the EEA not UK but is compliant)
Human Oversight	Human must be ultimate decision-maker; AI stoppable.	Human-in-the-loop, on-the-loop, and in-command mechanisms required.	Compliant
Sustainability	Not explicitly addressed.	Sustainability is a core principle; aligned with SAP's environmental policies.	Aligned to broader Corporation policy as part of responsible procurement

4. Acceptable Use and Restrictions

Aspect	City of London	SAP	Compliance
Acceptable Use	GenAI may be used for work-related tasks (e.g., reports, presentations).	AI must not be used for unlawful, offensive, or deceptive purposes.	Compliant (AI use cases are limited and remain in the SAP ecosystem like Co-Pilot)
Prohibited Use	No confidential data input; no discriminatory or offensive content.	Prohibits surveillance, deanonymization,	Compliant (some sensitive data is available e.g. HR

Aspect	City of London	SAP	Compliance
		deception, and social scoring.	system but it is not input)
Disclosure	GenAI-generated content must be clearly identified.	End-users must be aware of AI interaction; AI must be identifiable.	Compliant

5. Vendor and Third-Party Considerations

Aspect	City of London	SAP	Compliance
Vendor Policies	Users must acknowledge vendor terms and conditions.	SAP may include third-party AI models; pass-through terms apply.	Compliant (SAP terms are part of CoL agreement)
IP Ownership	Input/output ownership must be clarified.	Output may not qualify for IP protection; SAP retains rights to its materials.	Question to be answered

6. Risk Management and Compliance

Aspect	City of London	SAP	Compliance
Risk Assessment	Mandatory for GenAI use; includes legal, bias, security, and data protection.	Use case evaluation categorizes risk; periodic reviews required.	All new AI cases will be assessed by CoL prior to launch and approved
Legal Compliance	Must comply with Data Protection Act 2018 and UK GDPR.	Compliance with global data protection and privacy laws required.	Compliant
Corrective Measures	Violations reported to senior management; disciplinary action possible.	Human rights due diligence process	Question to be answered

Aspect	City of London	SAP	Compliance
		applies for violations.	

7. Training and Literacy

Aspect	City of London	SAP	Compliance
Training	Required for accountable persons and end-users.	SAP provides free courses, community forums, and educational events	Part of the CoL training prior to launch (i.e. specific functions with user training)