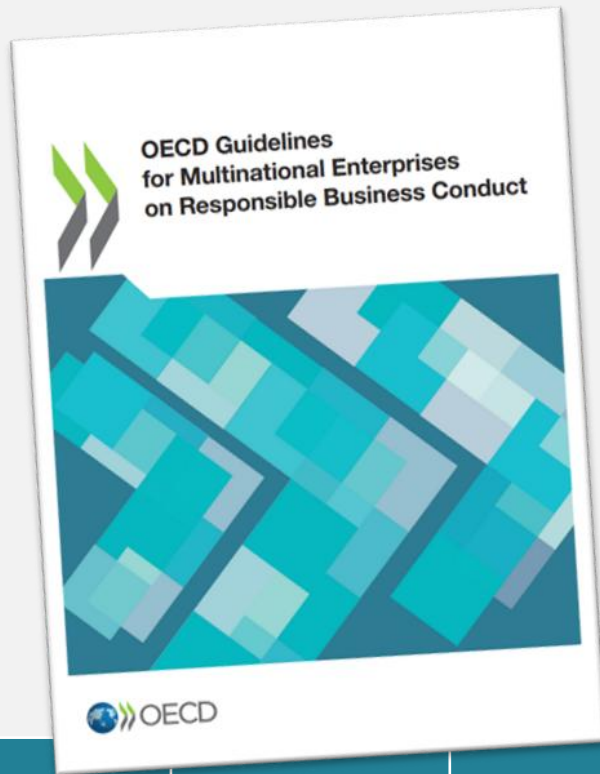


# Responsible AI by Design

TRANSLATING THE 2023 OECD GUIDELINES INTO EVERYDAY TECH PRACTICE

2 DECEMBER 2025, DATA SUMMIT LUXEMBOURG



Disclosure	Human Rights	Employment & Industrial Relations
Environment	Consumer Interests	Science, Technology and Innovation
Combating Bribery and Other Forms of Corruption	Taxation	Competition

- First adopted in 1976, updated 6 times (latest in 2023)
  - Most comprehensive international standard on RBC
  - Unique implementation mechanism: National Contact Points
  - Expectation of risk-based due diligence, aligned with other international RBC standards
- 2023 STI chapter: clarifies responsibilities for digital technologies and AI (use and misuse, data governance, digital security, children's rights)

# Who is responsible in the AI value chain?

What is expected?

How does due diligence look in practice?

## STI chapter: due diligence across the technology value chain

Create & enable AI	Design & build AI systems	Deploy & use AI
<ul style="list-style-type: none"><li>• Data and model providers</li><li>• Cloud, infrastructure, chip providers</li><li>• Investors financing AI development</li></ul>	<ul style="list-style-type: none"><li>• Developers and integrators of AI systems</li></ul>	<ul style="list-style-type: none"><li>• Public authorities, banks, hospitals, platforms</li><li>• Law firms, marketing agencies, start-ups</li></ul>

Who is responsible in the AI value chain?

## What is expected? Risk-based due diligence for AI

How does due diligence look in practice?

- Map where AI activities can cause, contribute to, or be linked to adverse impacts on people and the planet.
- Act to prevent and mitigate those impacts, using leverage in the value chain

From ...

To ...

***Is it legal?***

**Is it responsible?**

***We just build it***

**We are also responsible for use and misuse**

***We fix it with a policy***

**We fix it in the design**

***Ethics is a side document***

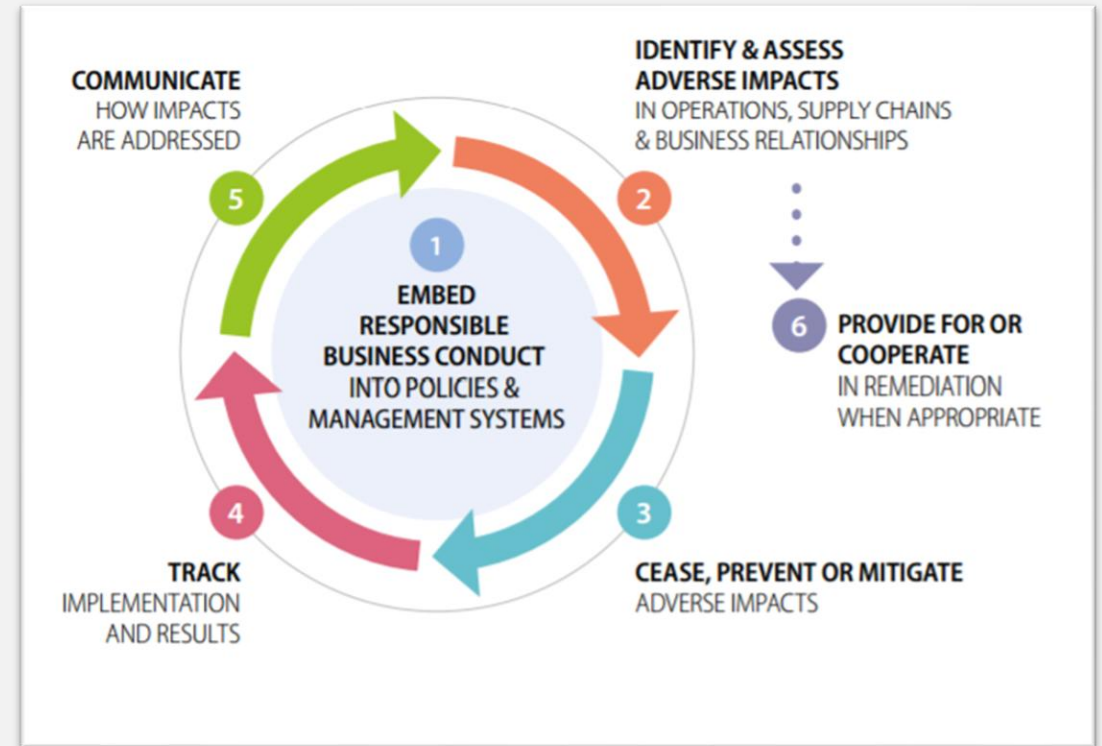
**Responsibility across the lifecycle**

Who is responsible in the AI value chain?

What is expected?

## How does due diligence look in practice?

- Identify & assess impacts
- Prevent & mitigate risks
- Track implementation & results
- Communicate how impacts are addressed
- Provide or cooperate in remediation



# Thank you!

Başak Bağlayan

Luxembourg National Contact Point for Responsible Business Conduct, Ministry of the Economy

[pcn@eco.etat.lu](mailto:pcn@eco.etat.lu)

*OECD Due Diligence Guidance for Responsible AI – forthcoming (OECD)*