

Guidelines for the use of artificial intelligence

Version 1.0 dated 1 October 2026

These guidelines govern the responsible use of artificial intelligence at Ringier Media Switzerland (RMS). They apply to all employees and freelancers, in both editorial and commercial work.

They set out how Ringier AG's "Guidelines for the Use of Artificial Intelligence" ("Ringier AI Guidelines", version 2.0 dated 17 November 2025) apply to day-to-day work at RMS and replace all previous RMS instructions and policies on the use of AI. In the event of a conflict, the Ringier AI Guidelines take precedence. As AI and its regulatory environment are evolving rapidly, and new tools and use cases continue to emerge, these guidelines will continue to be reviewed and updated regularly.

1. Principles

- **We take responsibility.** We stand behind everything we publish, regardless of the role AI has played in creating it. A person reviews and approves it: for individual items of content, the content itself; for automated formats, the process.
- **We do not use AI statements without checking them.** AI content may be inaccurate, incomplete or biased. We check it using our own judgement and expertise.
- **We do not mislead our audience.** AI-generated images and videos must not give the impression that they are authentic recordings of a specific real situation.
- **We are transparent.** We label AI-generated content in accordance with these guidelines. When our audience interacts with an AI system, this must be apparent from the first input.
- **We avoid discrimination.** Before publication, we check AI outputs for discriminatory or stereotypical content, particularly in relation to origin, ethnicity, gender, gender identity, sexual orientation, religion, philosophical beliefs, disability, age or social status.
- **We protect data and rights.** We enter confidential information and personal data only to the extent permitted and only into AI tools approved for that purpose. We use third-party content only when we have the right to do so.

2. Text and research

2.1 AI in research

AI outputs are never sufficient as the sole source. They give us leads to investigate. Sources, studies, court decisions or quotations cited by AI may be incorrect or fabricated. We check them against the original source before every use. We also establish where a source comes from and whether there are signs that content has been created or manipulated using AI.

For material critical to journalistic research, such as studies, court decisions, contracts, annual reports or minutes, AI summaries are no substitute for reading the original. An AI summary can provide an initial overview and help identify relevant documents. Its claims must be checked against the original source. Source protection also applies when using AI. When processing sensitive research material, we follow the requirements in section 6.1.

2.2 AI in writing

AI may suggest wording, edit text, provide feedback and produce first drafts. Authors use it in stages wherever possible: they set the direction, review interim results and decide how to proceed. They shape the essential elements of the published text themselves and use only material they have critically reviewed.

2.3 Opinion and judgement remain human

In opinion-led formats such as comment pieces, editorials, columns or reviews, the position, reasoning and judgement must come from a person. AI can challenge arguments and present opposing views. The assessment and final judgement remain the author's responsibility.

2.4 Reporting from the scene

Formats based on reporting from the scene, such as reportage or interviews, rely on direct observation. AI may help analyse the material, for example by transcribing recordings or organising notes. The finished text must contain nothing that is not supported by the author's own observations or the original material.

2.5 Critical review and responsibility

An AI-generated text is published only if it has been critically reviewed in full and the author has personally shaped its essential elements. It then appears under that author's name and without an AI label.

An AI-generated text is considered critically reviewed only if the following conditions are met:

- A journalist responsible for the relevant subject area has personally reviewed the substance of the entire text. Simply skimming it or checking only language and style is not sufficient.
- All facts have been verified against reliable sources, and quotations against the original source.
- The person carrying out the review takes responsibility for the content as they would for a text they had written themselves.

Exceptions apply to formats for which these guidelines expressly permit publication without individual journalistic review (sections 2.6 and 2.7).

2.6 Automated text

Text created automatically without individual journalistic review, such as live sports updates, weather reports or stock market reports, is labelled as AI-generated. The short accompanying texts described below are exempt.

Before launch, the entire format is tested and approved by the editor-in-chief or a person they designate. A person is appointed to take responsibility for ongoing operation and regularly checks samples of the output. Incorrect outputs are corrected. In the event of serious or repeated errors, automated publication is stopped.

Short accompanying texts, such as social media captions or push notifications, may be published through an approved automated process without individual journalistic review and without an AI label. This is permitted only if they merely announce or link to content that has already received editorial approval. They must be based exclusively on that content and must not add anything that goes beyond its substance. RMS retains editorial responsibility. For sensitive content, the accompanying text must undergo editorial review before publication. This includes, in particular, serious allegations against identifiable individuals or companies and legally sensitive passages. This review is also required for direct quotations.

2.7 Automatic translations

Automatic translations of existing texts are not considered automated text creation under section 2.6. No AI label is therefore required, even if the translation does not undergo individual editorial review. For sensitive content, particularly serious allegations against identifiable individuals or companies, direct quotations or legally sensitive passages, the translation must undergo editorial review before publication.

For translations without individual review, the process must be tested and approved by the editor-in-chief or a person they designate before launch. Quality is monitored through ongoing sample checks. If errors become frequent, translation is stopped until the cause has been resolved.

3. Images and videos

Our audience must be able to distinguish authentic recordings from AI-generated depictions. We therefore use AI primarily for illustrations that are clearly recognisable as such. We use photorealistic AI depictions, meaning those that could be mistaken for authentic recordings, only as symbolic images, purely decorative backgrounds or graphic elements. We clearly label AI-generated images and videos as such.

3.1 Permitted uses

We use AI-generated images and videos exclusively for the following purposes.

a) Clearly recognisable illustrations

AI may be used to illustrate topics, people, places or events. This includes depictions of situations for which no visual material is available, such as historical events, reconstructed sequences of events or future scenarios. Satirical depictions and caricatures are also permitted.

The depiction must be recognisable as an illustration at first glance, even without a caption, and must not be capable of being mistaken for an authentic recording.

b) Symbolic images

A symbolic image represents a topic and does not show what happened in a specific case. Symbolic images may be photorealistic and show generic objects and settings, as well as individual body parts.

However, they must not give the impression of documenting an identifiable real location, an actual event or a specific situation being reported on.

Examples include an entirely fictional detached house for an article about mortgages or a gold bar for an article about the price of gold. A handshake can symbolise two parties to a negotiation. By contrast, a photorealistic AI image that looks like a photograph of a specific fire or accident scene being reported on would not be permitted.

c) Purely decorative backgrounds and graphic elements

A background is purely decorative if replacing it does not change the substantive message. Permitted graphic elements include areas of colour, textures, abstract shapes, typography and 2D and 3D elements that convey no substantive message of their own. These backgrounds and elements may also be photorealistic. The same limits apply as for photorealistic symbolic images.

For all uses

We do not use AI to deliberately imitate the style of a specific artist, regardless of whether that style is protected by copyright (section 6.2).

3.2 People and animals in AI depictions

We do not use AI to generate depictions of people that could be mistaken for real ones, whether the people are fictional or existing. This applies in particular to faces, crowds and people in the background. Individual body parts are permitted. A hand or foot may be depicted photorealistically, provided no face is visible and no one is recognisable. The depiction must remain symbolic and must not give the false impression of showing what happened in a specific case.

The same applies to animals. We do not generate depictions of animals that could be mistaken for authentic recordings. Individual body parts, such as a paw or hoof, are permitted under the same conditions.

3.3 Real people in AI illustrations

Photorealistic AI depictions of people are prohibited. The consent of the person concerned does not change this. This rule protects both the person and the credibility of images in our media.

Depictions of real people that are clearly recognisable as illustrations interfere with their right to their own image (Art. 28 of the Swiss Civil Code) and constitute the processing of personal data (Art. 5 let. a of the Federal Act on Data Protection, FADP). They are therefore permitted only with the explicit consent of the person depicted. Exceptions apply to satire and caricature under section 3.4.

An exception to the consent requirement may be made for people whom a national audience would recognise without being told their name, such as heads of state or global stars. The depiction must serve an editorial purpose and relate directly to the person's public role or prominence.

The following additional requirements apply to all depictions under this section: unsubstantiated claims must not be presented as facts. The person's dignity, privacy and intimate life must be respected. The editor-in-chief or a person they designate must approve the use in every case.

3.4 Satire and caricature

Satire and caricature rely on distortion. They are permitted without the consent of the person depicted if all of the following conditions are met:

- The person depicted is a public figure.
- The distortion is apparent to the audience at first glance and without a caption.
- The depiction is not photorealistic.
- It has a satirical or caricatural connection to the public role of the person depicted.
- Unsubstantiated claims are not presented as facts.
- Dignity, privacy and intimate life are respected.
- The editor-in-chief or a person they designate approves the use.

3.5 AI avatars and synthetic presenters

AI avatars and synthetic presenters must not be photorealistic. Their appearance itself must clearly distinguish them from a recorded real person, and they must always be labelled as an AI avatar or synthetic character.

If an avatar depicts a real person or is recognisably based on them, their explicit, documented consent is required. This also applies to employees.

Chapters 2 and 4 also apply to the content conveyed by an avatar and to its voice.

3.6 AI editing of authentic material

Authentic photos and videos may undergo minor technical editing using AI, provided their content remains unchanged. The editing must not add details that are absent from the original recording. Cropping, colour correction, stabilisation, noise reduction and upscaling are therefore permitted, provided the result only sharpens what is already there. Pixelation to protect people is also permitted.

If a person provides an image of themselves, it may also have undergone cosmetic retouching, such as adjustments to skin or hair, as is common in conventional image editing. This is permitted only if a real photograph remains the basis of the image and neither the person nor essential parts of the depiction have been recreated using AI.

Where required by the layout, particularly in print products, an image may be extended slightly at its edges using generative AI, for example by adding a strip of empty sky. Only an existing area that conveys no information of its own may be continued beyond the original image boundary. The substantive message of the image must not change as a result.

These technical edits, cosmetic retouches as defined above and minor generative extensions do not require a label.

Any further changes to documentary content are prohibited, particularly adding or removing people, animals or objects, replacing the background, or changing facial expressions or actions. Images in which people or essential parts of the depiction have been recreated using AI, or which can no longer be considered edited authentic recordings, are also prohibited.

Permission to publish a copyrighted image or video for the first time does not automatically permit changes to its content using AI. The right to the integrity of the work under Art. 11 of the Copyright Act (CopA) must also be respected.

3.7 Review before publication

Every image and video in which AI has generated or altered visual content is reviewed by a person before publication. In particular, the following must be checked:

- Is the use permitted under sections 3.1 to 3.6, and have any additional conditions, such as consent or approval, been met?
- Does the depiction contain visible errors, for example in body parts, lettering or objects?
- Are the time, place and other details important to the content depicted correctly?
- Are people, institutions or groups wrongly associated with a matter, or depicted in a stereotypical or discriminatory way?
- Could third-party rights be infringed, for example through similarities to real people or the use of logos, protected product designs or recognisable elements of protected works?

Depictions that fail this review are corrected and reviewed again, or are not published.

3.8 Labelling and credit

AI-generated images and videos are always clearly labelled in editorial content and in commercial content presented in a journalistic format. This also applies if they have been reviewed before publication. The technical edits, permitted cosmetic retouches and minor generative extensions referred to in section 3.6 are exempt.

AI-generated images also carry the name of the person responsible for creating them. The rules in chapter 5 govern the form and placement of labels and apply to other commercial content.

4. Audio and voice

4.1 Synthetic voices for human-created content

When a human-created text is read using a synthetic voice, for example in a read-aloud feature or as a voice-over in a video, this is considered an assistive use of AI. No label is required as long as the voice is not attributed to a specific person.

Synthetic voices that imitate a specific real person or give the impression that the person spoke the text themselves do not fall under this section. Section 4.3 applies to them.

4.2 AI-generated audio content

Audio formats whose content has been generated entirely or predominantly by AI are always clearly labelled. Examples include automatically created podcasts or AI-generated conversation formats, even if they have been critically reviewed before publication.

4.3 Voices of real people (voice cloning)

A real person's voice may be replicated and used with AI only with their explicit, documented consent, for a purpose defined in advance and within the agreed scope. Any use beyond that scope requires new consent. This also applies to employees and, subject to the personality rights of surviving relatives following a death, to deceased people. The use of the replicated voice is always clearly labelled.

5. Labelling

5.1 Principle and decision process

Labelling makes it clear where and how AI has been used and supports compliance with legal and media ethics requirements. It does not replace a content review, consent, rights clearance or approval, and it does not make prohibited content permissible. Before every publication, we therefore first establish whether the content is permitted and then whether and how it must be labelled.

Wherever possible, the label is placed directly alongside the content concerned. If only one element has been generated or substantively altered using AI, we label that element. If AI use affects the entire item, we label the item as a whole.

If a critically reviewed text is subsequently supplemented or substantively altered using AI, the amended version must be reviewed again in full before publication. For images, videos and audio content, the required reviews and approvals must be repeated after a substantive change. Purely spelling-related or technical changes that do not alter the meaning do not trigger a new full review.

The specific AI model or tool used does not have to be named.

5.2 Placement

These requirements apply to every label under these guidelines. It must be visible or audible on first contact with the content or system, clearly understandable and accessible.

Text: before the content or directly alongside the relevant text element. Not at the foot of the article or in the metadata.

Images and graphics: on the visual itself or directly alongside it.

Video, animation and audio: the disclosure appears at the start, visibly in the video or audibly in the soundtrack. If AI use affects only individual sequences or passages, the disclosure appears immediately before them. A note in the video description or show notes is not sufficient.

Interactive AI systems: the label appears before the first input and remains visible throughout the interaction. A disclosure only in the terms of use or behind an information icon is not sufficient.

5.3 Commercial content

Branded Stories and advertising supplied by advertisers

Branded Stories follow the editorial rules in chapters 2 to 5.

Advertisers are responsible for ensuring that the advertising materials they supply comply with legal requirements for advertising and carry the required labels. As a publisher, RMS shares responsibility, including for the separation of advertising and editorial content and the prohibition of misleading content. If RMS becomes aware of missing labelling or misleading content, or there are specific indications of either, RMS clarifies the matter with the advertisers. Distribution is suspended until the matter has been clarified.

Marketing and corporate communications

There is no general labelling requirement for marketing and corporate communications content created by RMS. This applies in particular to AI-generated design elements, such as generic objects or backgrounds. The prohibition of misleading content always applies. Particular care is required, however, with photorealistic depictions generated or substantially altered using AI that could be mistaken for authentic ones.

Where there is no legal or other binding labelling requirement, the responsible teams decide whether a label is appropriate in the specific context. Legal must be consulted if there is any uncertainty.

5.4 Third-party material and supplied content

Existing labels and provenance metadata are retained. We look for visible inconsistencies even in material from established agencies. Where there are reasonable doubts about provenance, authenticity or AI use, we ask the source before publication. The material is not published until the matter has been clarified.

For externally commissioned content, the person commissioning it establishes before publication whether AI has been used to generate or substantively alter it. The commissioned person or service provider discloses the nature and extent of AI use.

6. Rights, data and source protection

6.1 Inputs into AI tools

AI tools process all content we enter or upload. Whether the provider may store, analyse, use for training or share that content depends on the contractual agreements. The following rules therefore apply:

- **Enter sensitive data only into AI tools approved for that purpose:** confidential information and personal data may be entered only into AI tools that RMS has approved for the relevant data category and specific use case. Confidential information includes non-public strategies, budgets, unpublished financial data, contractual terms and internal decisions. Personal data includes information about employees, customers or business partners, including contact details, photos, videos and voice recordings. We use only our business account and enter only the information necessary. The AI Toolbox specifies which data may be processed in which tool.
- **Never enter certain information:** passwords, API keys and other login or access credentials must not be entered into any AI tool. The same applies to employee health information, information from internal investigations or suspected cases, and highly confidential company data, such as non-public M&A information.
- **Protect research material and sources:** court files and other sensitive research material may be processed only in AI tools approved for that purpose and only to the extent necessary for journalistic work. Statutory, court-imposed and other special confidentiality obligations must be observed. Information that identifies a confidential journalistic source or allows their identity to be inferred must not be entered into AI tools. If in doubt, we refrain from using AI and contact Legal.

- **Respect rights to third-party content:** third-party text, images, videos, audio and other protected content may be uploaded or used in a prompt only if the necessary rights also permit processing with AI. The right to publish content does not automatically include the right to process it with AI. Where there is uncertainty, the content is not uploaded until the rights have been clarified.
- **For images and videos, always check several layers of rights:**
 1. **Rights to the recording:** does the photo licence or agency agreement permit its use and editing with AI?
 2. **Rights of the people depicted:** where AI editing is permitted under these guidelines, it must be checked whether the consent of recognisable individuals also covers the specific editing. Permission to publish a photo or video does not automatically permit editing it with AI.
 3. **Rights to protected elements:** may the works, designs, trademarks or other protected elements shown be used or altered?

Image rights, personality rights and rights to depicted elements must be checked independently of one another.

- **Protect software code:** third-party code may be entered only if the licence or contract permits it. Code that constitutes a trade secret may be processed only in AI tools approved for that purpose. The code entered must not contain login or access credentials.

6.2 Copyright in outputs

Style, general techniques and ideas are generally not protected by copyright. AI-generated content that merely adopts a style therefore does not infringe copyright. However, out of fairness to creators, we refrain from deliberately imitating the style of a specific artist (see section 3.1).

Even though a style is not protected as such, an AI output must not be based so closely on a specific protected work that the work remains recognisable in it. This may be the case, for example, where distinctive characters, specific visual compositions, text passages, melodies or other individually created elements are reproduced. We use such an output only if we have the necessary rights, for example through the rights holder's consent, or if the use is permitted by law.

6.3 Rights to use outputs commercially

If we use AI output without making a sufficient creative contribution of our own, we generally do not acquire copyright in it. RMS therefore cannot rely on copyright-protected exclusivity for purely AI-generated content. Whether an output may be used commercially also depends on the terms of use and contractual agreements of the AI tool used.

We do not promise commercial clients exclusivity in AI-generated content. If a client requests such a commitment, Ringier Legal decides before the contract is concluded.

7. Tools, AI projects and AI development

7.1 Standard and approved AI tools

The Ringier Group defines the standard tools for business use. The current standard tools and other approved tools are communicated on the intranet. These tools are covered by contractual and data protection arrangements reviewed by Ringier.

Anyone looking for another tool first checks the AI Toolbox. It lists the Gems and other tools approved and in use at RMS. Additional access or approval requirements may apply to individual tools.

7.2 Use of other AI tools

Other AI tools may be used for business purposes only if the tools approved under section 7.1 do not cover the specific use case, or do not cover it adequately, for example because a required function is missing.

For paid tools with total annual costs of more than CHF 150, approval from the CFO of RMS is required before purchase.

If personal or confidential data is to be processed with a tool that is not approved as standard, approval from Legal, Data Protection and Information Security is also required before use. This applies to both paid and free tools. No such data may be entered or uploaded into the tool until approval has been given.

7.3 In-house applications and AI projects

AI projects and use cases must be reviewed if they go beyond the ordinary use of an approved tool and pose particular risks because of the data used or the technical implementation.

This applies in particular to:

- in-house development and the integration of AI into products, processes or applications;
- APIs, automated interfaces and access to Ringier systems or data;
- the processing of customer, personal or confidential data.

The review covers, in particular, copyright and usage rights, data protection compliance and information security. Production use is permitted only after formal approval by Legal, Data Protection and Information Security.

The following requirements apply even before production use:

- Do not include secrets, API keys, passwords or other access credentials in prompts or source code.
- Do not use personal accounts, tokens or access credentials for tools that access or process Ringier data.
- For testing, use only approved, sufficiently anonymised or synthetic data.

8. Training

RMS implements the training requirement under point G of the Ringier AI Guidelines through the RMS AI Upskilling programme.

The AI Awareness E-Learning is mandatory for all RMS employees. It provides the common foundation for understanding what may and may not be entered into AI tools.

Gemini Sessions (Ringier AI Learning Hour) and AI Deep Dives by MediaLab are also available on a voluntary basis, with a progression through levels and a certificate.

9. Responsibility and contact point

The RMS AI Ethics Committee is responsible for interpreting and developing these guidelines. It is the first point of contact for questions about their application, particularly complex individual cases and matters of principle. It also serves as a reporting point for external individuals with questions or

complaints about the use of AI at RMS. Enquiries can be submitted by email to rms-ai-ethics@ringier.ch.