



RUNNING EXAMPLE

Rhena settles its AI policy in October 2026, three months before ANNA's mandate.
Owned by Dr Katrin Ostermann (DDAO).

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1 THE RULE · TWO REGIMES, ONE TEXT

USE AND DECISION

Assisted AI proposes and the human decides. Agentic AI decides and acts within a perimeter. Legal accountability sits in the second regime, which almost no usage policy addresses. The ACF policy covers both and defers to the agentic constitution (ACF-04) for the detail of each agent.

WHAT THE POLICY COMES BEFORE

It is laid down before the first agent and grounds the mandates (ACF-13) and the non-delegable zones. An organisation that writes mandates with no policy writes rules and nobody knows on whose authority they bind.

2 WORKED EXAMPLE · RHENA · AI POLICY V1.0, OCTOBER 2026

PART	WHAT IT SETS	WHO OWNS IT	REVIEW
A · Tool use	Approved tools, human read-through before anything reaches a policyholder	IT, with compliance	Yearly, or at any new tool
A · Data	No health data and no loss-adjuster report in a tool hosted outside the European Union	Group DPO	Yearly
B · Delegated decision	Every deciding agent goes through a written mandate (ACF-13) and a rated criticality (ACF-03)	Dr Katrin Ostermann (DDAO)	At every new mandate
B · Non-delegable zones	Declining cover, qualifying a fraud, files in litigation, policyholders under guardianship	Marek Sobczak	Twice a year
B · Territorial reach	The group policy is not a mandate outside Germany: each entity signs its own	Legal division	At every new country
C · Governance	Quarterly review, decision register (ACF-09), named route of appeal (ACF-O10)	Dr Katrin Ostermann (DDAO)	Quarterly



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3 CHECK WHEN RE-READING

THE LIST OF PROHIBITIONS

It must name decisions, not technologies. A ban aimed at a product ages within six months; “no account closed without a human” holds.

THE REVIEW DATE

A policy with no review date written into it becomes an archive document the day the tooling changes. At Rhena the review is owned by a named person rather than a department, and the territorial reach row was added afterwards, when the US subsidiary asked for the same agent.

A policy that does not list the decisions it refuses to delegate is not a policy, it is an intention.