TEMPLATE P40 · EXCEPTION REQUEST AND REGISTER

Exception request and register

Processes each temporary exception to the policy or the framework with its justification, risk, compensating measures, approving body, conditions and expiry, and maintains the company's exception register.

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Why it matters. An exception is a conscious decision not to comply with a requirement for a period of time, with the risk in view and an owner. Without a request and a register, exceptions become tolerated breaches that nobody approves or monitors, and the board committee cannot receive those in force each quarter, as 30 §7.4 requires. An expired exception that has not been closed is a major nonconformity (31 §3.8).

01

Instructions for use

Aspect	Guidance
When it is used	Before ceasing to comply with any requirement of the corporate policy, the acceptable use policy or the framework that admits an exception. Never after the event.
Who completes it	Whoever proposes according to the type (section 5): AI Product Owner, requesting area, AI Sponsor or AI Committee. The AI Office assigns the code and keeps the register.
Who verifies it	The AI Office checks admissibility and completeness; the second line assesses the risk and issues clearance where required.
Who decides or approves	The body in the delegation matrix of 30 §7.4, according to the type. Whoever proposes does not approve (30, I-9).

Aspect	Guidance
Stage, *gate* or moment	At any time; those in force are reviewed at each monthly meeting of the AI Committee and reported quarterly to the board committee (C4).
Tool	T01 · Use case register (exceptions linked to use cases and decisions, 30 §13).
Reference document	30 §7.4 and §8.3; 31 §3.7, §3.8 and §4; 37 §3.

Completion rules:

- Exceptions are **never** allowed for prohibited practices, legal obligations, segregation of duties at any *gate*, Enterprise multi-level sign-off or the existence of a stop mechanism (30 §7.4), or for the red lines of the corporate policy (31 §3.7).
- An exception does not replace a "Proceed with conditions" at a *gate*: if the matter is decided at a *gate*, it is dealt with in P29.
- Proposed code: **EXC-AAAA-NNN**, with the year of the request and a sequential number that is never reused, even if the request is refused.
- An extension is processed as a **new request** linked to the previous one, approved by the same body (rule proposed by this template).

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Identification

Field	Content	Guidance
Code		EXC-AAAA-NNN.
Date of request		DD-MM-AAAA.
Requester and area		
Type of exception		Minor methodological · Use policy · Lifecycle requirement · Corporate threshold (30 §7.4).
Scope		Use case (IA-AAAA-NNN), system (SIA-AAAA-NNN), tool, area or company.
Linked previous exception		If it is an extension.

03

Admissibility check

If any answer is Yes, the request is inadmissible and is filed with the reason.

#	Does the exception affect…?	Yes · No
1	A practice prohibited by Article 5 of Regulation (EU) 2024/1689 or any other red line of the corporate policy.	
2	A legal or regulatory obligation.	
3	Segregation of duties at any *gate* (whoever builds verifies or decides).	
4	The Enterprise multi-level go-live sign-off.	
5	The existence of a stop mechanism (kill switch or alternative process).	

Field	Content
Result	Admissible · Inadmissible
Checked by (AI Office) and date	

04

Request

Minimum fields of 31 §3.8.

Field	Content	Guidance
Requirement affected		Document, section and text; *gate* criterion from document 21 or SEG-NN or AG-NN control if applicable.
Justification		Why it cannot be complied with now and what would be lost without the exception.
Risk		What may happen while it lasts (section 6).

Field	Content	Guidance
Compensating measures		Temporary controls that reduce the risk.
Term requested		Within the maximum for the type (section 5).
Owner		Person accountable for the measures and for closure.
Closure plan		What will be done to comply with the requirement on expiry.
(illustrative example) **Requirement affected**	Acceptable use policy 31 §4.2: only tools in the authorised catalogue.	Four-week pilot of an uncatalogued summarisation tool, with fictitious data only.

05

Approving body

Matrix of 30 §7.4. The company may tighten it in C2, not lower it.

Type	Illustrative example	Proposes	Approves	Maximum term
Minor methodological	Using an equivalent in-house template.	AI Product Owner	AI Office	Until the next *gate*
Use policy	Uncatalogued tool in a pilot with fictitious data.	Requesting area	AI Office with security clearance	90 days
Lifecycle requirement	Postponing a non-critical piece of evidence outside a "Proceed with conditions".	Sponsor	AI Committee	6 months
Corporate threshold	Exceeding the investment limit per stage or the return horizon set in C2.	AI Committee	Board or board committee	As resolved

In the AI Committee, exceptions require the presence and clearance of the second line (30 §3.3 and §8.3). If the second line withholds its clearance, the committee cannot approve the exception and may escalate the disagreement to the board committee (E-13).

06

Risk assessment

Scales of the common specification §5.1 and document 33.

Field	Content	Guidance
Risk during the exception		Cause, event and consequence.
Likelihood and impact without measures		1–5 × 1–5; impact: the highest of the five axes.
Level without measures		Low 1–4 · Medium 5–9 · High 10–15 · Critical 16–25.
Effectiveness of the compensating measures		Existing and tested; planned measures do not reduce the level.
Level with measures		
Second-line clearance		Mandatory for exceptions decided by the AI Committee and for use policy exceptions (security).
Consistency with risk acceptance		If the level with measures is High, only the AI Committee accepts it; if it is Critical, the exception is not approved unless the board or its board committee expressly decides so within the appetite (30 §7.2).

07

Resolution

Field	Content	Guidance
Outcome		Approved · Approved with conditions · Refused.
Body and reference		Minutes (P39) or AI Office register.
Conditions		Each with an owner and a deadline.
Start date of validity		
Expiry date		Never later than the maximum for the type. For corporate thresholds, as resolved.

Field	Content	Guidance
Reason for refusal		Mandatory if refused.
Communication to the requester		Date.

08

Monitoring and closure

Proposed statuses: Requested · Inadmissible · Under assessment · Refused · In force · Closed · Expired. An exception in force whose expiry date passes without closure becomes **Expired** and a major nonconformity is recorded (31 §3.8; document 37).

Field	Content	Guidance
Reviews		Date and result of each monthly review by the AI Committee.
Closure date		When the requirement is met or the excepted activity ceases.
Evidence of closure		Link.
Nonconformity opened on expiry		NC-AAAA-NNN, if applicable.

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Company exception register

Code	Type	Scope	Requirement affected	Risk level with measures	Approved by	Reference	Start	Expiry	Owner	S
EXC-AAAA-NNN				Low · Medium · High						
(illustrative example) **EXC-2026-003**	Use policy	Marketing area	31 §4.2	Low	AI Office with security clearance	Office register 2026-11	02-11-2026	30-11-2026	Person G	I f

Quarterly summary for the board committee (incorporated into P42):

Period	In force	Approved	Refused	Closed	Expired	With High risk
AAAA-Qn						

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Quality criteria

#	Check	Status
1	The request predates the excepted activity.	Met · Not met · Not applicable · Pending
2	The admissibility check has been carried out and no answer is Yes.	
3	The six minimum fields of 31 §3.8 are present.	
4	Approval is by the body in 30 §7.4 and not by whoever proposes (I-9).	
5	Second-line clearance is recorded where required.	
6	The expiry does not exceed the maximum term for the type.	
7	Exceptions in force have been reported to the board committee in the quarter.	
8	No expired exception remains without a recorded nonconformity.	

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Approval and verification

Function	SEVEN-G role	Name and position	Date	Signature or reference
Proposes	According to the type (section 5)			
Checks admissibility and records	AI Office			

Function	SEVEN-G role	Name and position	Date	Signature or reference
Assesses the risk and gives clearance	Second line (security, risk or compliance)			
Approves	Body in 30 §7.4			

Segregation of duties: whoever proposes does not approve; if the AI Office proposes an exception, it is approved by the AI Committee.

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Version control

Completed document

Version	Date	Author	Changes

Template

Version	Date	Changes
0.1	19-09-2026	First version. Applies 30 §7.4 and 31 §3.8; proposes the code EXC-AAAA-NNN, the statuses and the rule that an extension is a new request.

External sources cited

Links to the official or primary source, checked before publication. Always verify the version in force on the date of use.

Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act) · https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng · Parlamento Europeo y Consejo de la UE · 13-06-2024