



Yoti Guardian Council Meeting Minutes

Attendance: See Table 1
Date: 24-03-25 - 15:00-17:00

Location: Google Meet
Recorder: OG

Agenda:

- Welcome and approval of previous minutes
- Revenue Growth - L2¹
- Privacy update -
 - Overview of Project to use Yoti Client UKDIATF data for R&D training - L2
 - Transparency Reporting - L1
- Yoti preparation for EU AI Act and ISO AI Management standard 42001 - L2
- Yoti audit/compliance - L1
- Ongoing - Rollout of AI tools - copilot for tech team & Yoti guidelines for AI SW development - L1
- Accessibility - L2
- Community Mgt - L1
- Times Event - L1
- Fraud prevention & Security Centre updates - L1
- AOB
- Close

Welcome and approval of minutes from the previous meeting	<p>Yoti staff opened the meeting and welcomed the Guardians to the meeting. A chair was officially nominated.</p> <p>Minutes for the Guardian Council meeting in December Q4 were approved by the Guardians present.</p>
Update on Trading update	<p>Yoti senior staff shared updates on recent business performance and company developments.</p> <p>Age assurance continues to show strong momentum alongside identity verification services. Growth is being driven by increased demand for AI-powered facial age estimation and secure document-based verification, helping clients meet evolving compliance requirements.</p> <p>Yoti continues to scale efficiently through its proprietary in-house technology, designed to support growth with minimal incremental cost. The company remains focused on operational discipline, team recognition, and delivering long term value.</p>
Privacy update Overview of Project to use Yoti Client UKDIATF data for R&D training - L2 15:11 to 15:30	<p>The Privacy Team provided an update on R&D work which is ongoing and the relevant lawful basis for that workstream. The Guardians welcomed feedback on user understanding and transparency.</p> <p>Yoti senior staff acknowledged these challenges and stressed the importance of maintaining competitiveness while balancing user rights. A retention period was agreed as justified to ensure effective model testing and improvement over time. All R&D data will be de-identified, with separately stored hashed personal data retained solely to process opt-out requests. The Privacy and R&D and product team is committed to reviewing that data use is responsible and ongoing review and refinement of their approach.</p>

¹ **Level 1** Educational (non-controversial, simple topics of 1,2 and 3). 5mins

Level 2 Informational (for mid level of complexity topic the Guardians will be asked to consider the proposed next steps and any flagged issues or difficulties). 10-20 mins



Privacy update Transparency Reporting Law enforcement requests for data disclosure 2024 L1	<p>Transparency Reporting</p> <p>The Privacy Team provided an update on Yoti's legal obligation to report law enforcement data access requests, confirming the only request was received on 24 December 2024 and handled in line with internal policy.</p>
Yoti preparation for EU AI Act and ISO AI Management standard 42001 L2	<p>The Privacy and the Compliance Team introduced the newly formed internal AI Working Group, which focuses on addressing the evolving compliance landscape, particularly obligations emerging from the EU AI Act. The Yoti team has begun internal work to assess and interpret the Act's relevance to its operations and customer impact.</p> <p>Privacy Team shared that while initial analysis suggests limited direct impact on Yoti's internal operations it could affect customers' due diligence expectations. We expect Responsible AI development and transparent data practices to become increasingly critical for customer onboarding</p> <p>CM outlined Yoti's approach to compliance, highlighting the integration of ISO 42001 an emerging management standard for AI into the organisation's broader compliance framework. Yoti is already certified to several ISO standards (security, privacy, and quality management) and intends to adopt ISO 42001 using the same integrated system approach. The standard focuses on documenting AI practices, conducting risk assessments, and embedding continual improvement.</p> <p>The team is monitoring developments and expects further updates in the next six months.</p>
Yoti audit/compliance L1	<p>Compliance Manager</p> <p>The Compliance Manager updated the group on the most recent surveillance activities and the completion of Yoti's annual SOC 2 audit-one of the company's most rigorous compliance efforts. SOC 2 audits involve an in-depth, retrospective assessment of evidence across the previous year. Auditors select random controls (Yoti maintains approximately 120) and assess compliance throughout the year, which makes early-year mistakes unfixable by audit time.</p> <p>Yoti has undergone SOC 2 audits for six to seven years and received a strong report this cycle, with only one minor exception noted-an outcome described as excellent for a company of Yoti's age and size. These reports are essential not only for internal assurance but also in demonstrating robust compliance during sales and customer due diligence.</p>
Ongoing - Rollout of AI tools - copilot for tech team & Yoti guidelines for AI SW development	<p>Director of Engineering, eSign & SaaS Integrations</p> <p>The Engineering team provided an update on the rollout of GitHub Copilot at Yoti.with appropriate governance and privacy policies in place and with staff training delivered. A significant percentage of engineers have onboarded, with plans to expand to the full cohort shortly. Training has focused on ensuring staff understand the limitations of the tool. Benchmarks indicate a potential 20% productivity increase, although expectations are being carefully managed.</p>



L1	<p>Discussion followed on the challenges of evaluating productivity gains, the need for human oversight, and Copilot's effectiveness in areas such as code testing. One of the Guardians shared insights from a pilot where Copilot integrated with GitHub proved significantly more effective than using it in isolation.</p> <p>Concerns were raised about Copilot's training on publicly available open-source code and potential IP risks. The team confirmed a cautious approach, including disabling open-source ingestion features where possible. As the tool remains under evaluation, the Yoti team will continue to monitor developments</p> <p>The Guardians concluded with agreement that Copilot represents an opportunity for responsible innovation, provided governance, user control, and transparency are maintained.</p>
Accessibility L2	<p>The QA Team provided an update on accessibility initiatives, noting progress on ID verification and age verification services, with external testing validating improvements.</p> <p>Two Guardians emphasised the importance of involving and compensating civil society and disability groups fairly. They suggested skill swaps, structured collaborations, and co-authoring white papers to create shared value.</p> <p>The Guardians shared user experience concerns, pointing out that written instructions were difficult to follow and recommended voice interfaces and in-app guidance to improve accessibility.</p> <p>The Guardians concluded with recommendations for disability-led consultancies and underscored the need to avoid relying on unpaid expertise, reinforcing the session's theme of inclusive, ethical progress.</p>
Community Management L1	<p>The Product Engineering Team gave an update on changes to the age verification portal and how customer feedback has led to the development of specific new features, which were detailed and demonstrated, designed to support consumer appeals.</p> <p>The Team welcomed feedback on the proposed process and asked whether similar models had been seen elsewhere. The Guardians supported simplifying the system and tracking its impact on retention. The Team added they would monitor patterns across different game types and demographics, with rollout in a number of geographies.</p> <p>ACTION: The Guardians suggested that for the next Guardian Council meeting, they revisit the process which the Team had presented. The aim would be to track the impact of the process adjustments and use data to determine their effectiveness.</p>
Times Event L1	<p>The Marketing Team introduced the idea of hosting a newspaper-sponsored event designed to compare human versus machine age estimation accuracy using a diverse pool of 100 participant images. Volunteers in the room would also be asked to guess participant ages as a form of interactive challenge, with the goal of showcasing the effectiveness of Yoti's facial age estimation technology.</p> <p>The Guardian suggested using a controversial public figure as a "refuser" to attract publicity, The Team acknowledged the idea's potential while noting the need for this to resonate with partners The Guardians supported the concept and proposed more offline events to improve engagement and understanding. They suggested involving platforms in the promotion and possibly re-engaging past influencer partners to reach younger audiences.</p> <p>The team explained that the newspaper preferred not to offer monetary incentives, instead relying on staff and community networks. And that the newspaper is expected to lead on promotional actions.</p>
Fraud prevention & Security Centre updates	<p>The Global Operation Team presented an overview of recent fraud trends identified through Yoti's security centre. An update was given on the number of manual ID checks performed in February, and the number of fraud instances, with the resulting-a fraud rate across the</p>



L1	<p>manual verification services.</p> <p>The Operations Team explained the breakdown between their two core products: digital ID and IDV (identity verification), and their respective fraud rates. Most fraud was classified as “impostor fraud” involving manipulated images rather than forged documents. He noted that a significant percentage of fraud on digital ID involved national ID or driving licences, while the IDV product showed a more even distribution across document types. The Operations Team shared insights into a range of fraud tactics.</p> <p>The presentation concluded with statistics on repeat offenders, where over 90 cases were flagged for recurring fraudulent behaviour. The Team closed by inviting follow-up questions and offered further detailed insights upon request.</p>
Close	The meeting was called to a close at 17.00.

Table 1: Meeting Attendance ● = in attendance ○ = absent/apologies ☒ = Not scheduled to attend														
Guardians							Yoti staff							
Seyi Akiwowo	●													
Dorothy Gordon	●													
Sindhu Joseph	●													
Jerry Michalski	●													