

PRINCIPLES FOR LABELLING OF AI-GENERATED OR AI- MODIFIED CONTENT

10.7.2026

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PREAMBLE

As a brand committed to modern and effective communication, BLANCO leverages the opportunities offered by Artificial Intelligence (AI). AI helps us continuously optimize customer and consumer engagement across all touchpoints and bring the BLANCO brand, the BLANCO UNIT, and BLANCO products to life in a tangible and meaningful way.

At the same time, as a company with a history spanning more than one hundred years, we place people at the center of everything we do and make reliability and a strong sense of responsibility the guiding principles of our daily work.

Against this background, we ensure that the use of AI in both text and visual content is transparent and understandable. We comply with all applicable legal requirements and ensure their consistent implementation throughout the entire company.

BACKGROUND: EU AI REGULATION (EU AI ACT)

BACKGROUND

- Creating content with AI is becoming easier and easier.
- Both the quality of the content and its reach are skyrocketing.
- An increase in disinformation and influence is being driven by a sharp rise in deepfakes and synthetic media.
- Users often don't realize that the content is AI-generated or AI-modified.
- AI-generated or AI-modified content is not protected by copyright. This means that this content can be manipulated, reused, and reproduced by third parties.

CONSUMER PROTECTION

- The EU has developed a new legislative package to protect the fundamental rights of consumers.
- It must be clearly identifiable what has been created using AI, in order to build trust and transparency.
- In the case of chatbots or AI systems designed to interact with people, it must be clear that an AI system is being used.
- Content generated, modified or manipulated by AI must be labelled.

FROM 2ND OF AUGUST 2026, THE LABELLING REQUIREMENT UNDER THE EU AI REGULATION (AI ACT) WILL APPLY.

THIS MEANS THAT ALL CONTENT GENERATED BY AI (IMAGES, TEXT, AUDIO AND VIDEOS) MUST BE LABELLED.

FROM 2ND OF DECEMBER 2026, THE REQUIREMENT TO INCLUDE MACHINE-READABLE LABELLING IN THE ASSET'S METADATA WILL APPLY TO BLANCO.

CONSEQUENCES OF NON-COMPLIANCE

- **Fines** of up to **€15 million** or **3 per cent of global turnover**, whichever is higher.
- In addition, competition law measures may be taken by competitors, consumer protection organisations, trade associations or public authorities.
- This applies to all external communications, regardless of the channel used and whether direct or indirect.
- It is not possible to transfer responsibility to customers or suppliers.

LABELLING REQUIREMENT

- Texts that are 100% AI-generated or 100% translated using AI.
(Exception: Texts or translations created using AI but subsequently edited and revised by humans. Please note that you must provide evidence.)
- Images and videos created using AI.

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FRAMEWORK FOR BLANCO

ALL BLANCO CONTENT THAT IS GENERATED BY OR WITH HELP OF AI MUST BE LABELED FROM 2TH OF AUGUST 2026 ON.

THIS APPLIES TO ALL CONTENT (E.G. TEXT, IMAGES AND VIDEOS)

THIS FRAMEWORK ENSURES THAT CONTENT ORIGINALLY INTENDED FOR INTERNAL USE DOES NOT CAUSE LEGAL PROBLEMS WHEN IT LATER BECOMES AVAILABLE TO EXTERNAL AUDIENCES OR INDIVIDUALS.

DETAILS ON THE LABELLING REQUIREMENT: TOUCHPOINTS

All channels and touchpoints are affected:

e.g.

- Websites
- Advertisements
- Posters / OOH
- POS material
- Trade fairs/events
- PR
- POS
- Catalogues & Price Lists
- Presentations
- Social Media
- Voice Over

DETAILS ON THE LABELLING REQUIREMENT: CONTENT

Images & Videos:

There is no clear definition of a „deepfake“.

Guidance on identifying deepfakes: Images that look like real people, objects, places or events. Unless it is obviously a fictional depiction, such as in a comic or a depiction of aliens.

We must also label images in which only part (e.g. the background) has been created using AI („AI-modified“).

In the case of pure image editing, e.g. lighting or colour correction, each individual case is assessed on its own merits.

Copy:

Texts/documents generated 100 % by AI.

Translations produced 100 % by AI.

If texts are edited or revised by humans after being created with or by AI, the requirement to label them does not apply.

Everything must be documented for evidential purposes; therefore, the original version should be saved before the text is revised by AI.

As internal content of any kind can also find its way into the public domain, all AI-generated content should be labelled by BLANCO!

DETAILS ON THE LABELLING REQUIREMENT: EXECUTION

The exact labelling is not precisely defined in law.

The labelling must be clear, unambiguous, clearly visible and accessible. Both as a logo and in the asset's metadata.

Labeling: 'AI-generated' or 'AI-modified'.

The labelling must be in the respective national language.

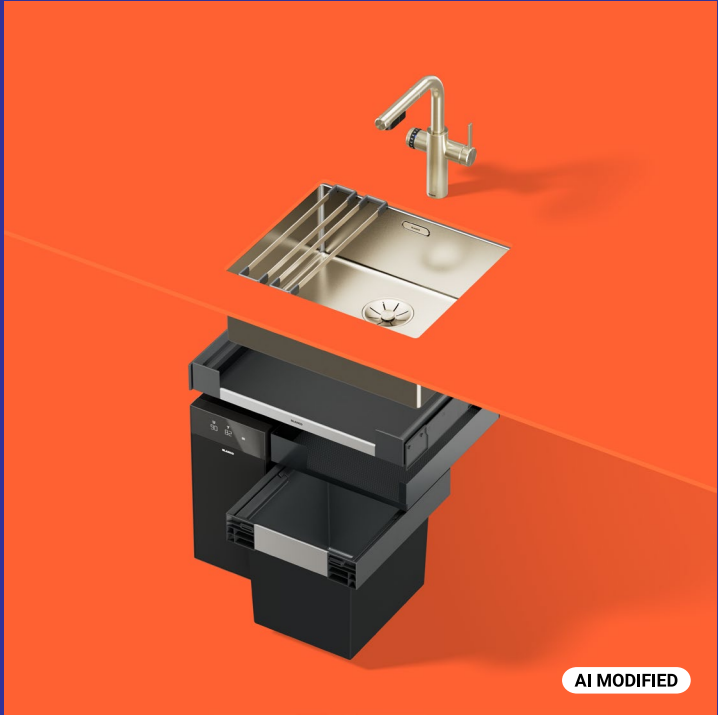
The labelling must be provided no later than the time of the content's first publication.

All AI-generated or modified content for all touchpoints must always be labeled accordingly.

Content from external agencies, 3rd parties or suppliers is subject to the labelling requirement.

This means that we cannot pass on the labelling requirement to others, but are responsible for the labelling ourselves.

BLANCO IMAGE LABELLING SPECIFICATIONS



SQUARE

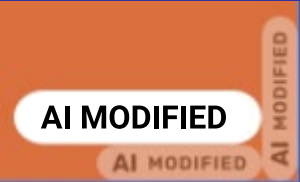


PORTRAIT

AI MODIFIED

AI MODIFIED

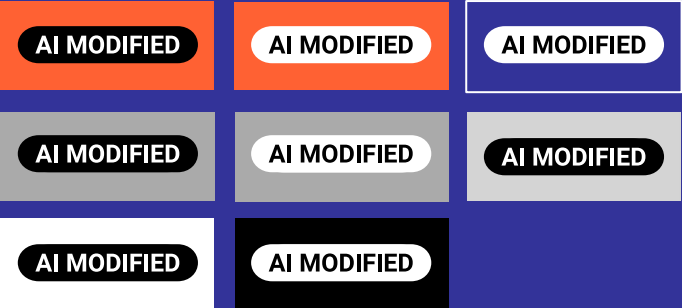
SIZE:
15% OF ORIGINAL LABEL FILE SIZE



POSITION:
LOWER LEFT OR RIGHT CORNER

SPACING:
10% LABEL SIZE HEIGHT TO EACH BORDER

BACKGROUND:



DETAILS ON THE LABELLING REQUIREMENT: COPYRIGHT

Please be aware: **BLANCO loses copyright if we use 100% AI-generated content!**

If content is generated entirely by AI, it is not eligible for copyright protection, meaning there is no legal recourse if the image or video is manipulated or reproduced by third parties (for example, if our products are replaced with others).

There is a distinction between AI-generated and AI-modified content.

AI GENERATED:

This applies when all content (images, audio and video) or text is generated entirely by AI, with no human-created elements or editorial control apart from prompting.

If content is generated using AI, no copyright arises in it, so there is no protection or recourse if the image or video is manipulated or reproduced by third parties. For example, our products could be swapped for others.

AI MODIFIED:

This refers to when pre-existing human-made content was partially modified using AI. The human factor in production remains important.

It is possible to retain copyright despite the use of AI if it can be proven that the creation is based on one's own ideas and foundations. Protection can be justified in cases involving prompting, selection, iteration, post-processing and final approval.

There are analysis tools that can identify AI-generated content. **So don't try to hide any AI – somebody will notice!**

PROCESS FOR AI-GENERATED CONTENT 3RD PARTY

THE ENTIRE AI-GENERATION PROCESS, I.E., ALL THE INDIVIDUAL STEPS THAT FOLLOW, MUST BE SET OUT AND DEFINED IN THE CONTRACT.



CONTRACT REQUIREMENTS

- Develop, in collaboration with the HQ legal team, a project contract for the development of an AI-generated or hybrid (modified) Content (e.g. image, video, graphics, copies, ppt, etc.).
- Take into account all legal aspects relating to what will be developed and how it will be developed (including all AI tools used in the process).
- Contract has to ensure that no internal BLANCO data is used in online AI Tools.

DEVELOPMENT REQUIREMENTS

- To safeguard usage rights, it is essential that the core source material is based on creation of human ideas, designs or 3D data and has been reviewed by a human.
- The service provider must ensure that no trade marks or copyright are infringed during production. This can be achieved through prompts designed to prevent such infringements or by using CGI-based assets or footage.

CHECK IMAGES

- The supplier must ensure that content generated by AI does not infringe copyright, design rights or trade mark rights, in order to prevent existing trade marks or products from being depicted.
- Supplier has to deliver the name of the used AI tool implement in the asset meta data for machine readability.

PROOF OF WORK

- To be able to prove that every effort was made to avoid infringing existing intellectual property rights and that the core ideas of the AI-generated image are based on your own ideas and processes, every step of the development must be documented.
- Document the prompt, the basic inputs (images, designs, CG data, etc.), all AI tools used, and all post-production tools.

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**THANK YOU
FOR YOUR
ATTENTION.**