



Bria Artificial Intelligence Ltd.

# Public Summary of Training Content

FIBO, FIBO Lite and FIBO Edit

Required by Article 53(1)(d) of Regulation (EU) 2024/1689 (AI Act), drawn up according to the Template annexed to Commission Communication C(2025) 5235 final of 24 July 2025.

|                        |                                    |
|------------------------|------------------------------------|
| Version of the Summary | Version 1.0. No previous versions. |
| Last update            | 02/08/2026                         |

## 1. General information

### 1.1. Provider identification

|                                                    |                                                                                                                                                    |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| Provider name and contact details                  | Bria Artificial Intelligence Ltd.<br>10 Kremenisty St., Tel Aviv, Israel<br>legal@bria.ai<br><a href="https://www.bria.ai">https://www.bria.ai</a> |
| Authorised representative name and contact details | Vered Horesh<br>Chief AI Strategy Officer<br>legal@bria.ai                                                                                         |

### 1.2. Model identification

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Versioned model name(s) | FIBO, FIBO Lite and FIBO Edit. This Summary covers all three, whose training content is identical.<br>FIBO Model Card: <a href="https://huggingface.co/briaai/FIBO">https://huggingface.co/briaai/FIBO</a><br>FIBO Lite Model Card: <a href="https://huggingface.co/briaai/Fibo-lite">https://huggingface.co/briaai/Fibo-lite</a><br>Fibo Edit Model Card: <a href="https://huggingface.co/briaai/Fibo-Edit">https://huggingface.co/briaai/Fibo-Edit</a>                                                                                                                                                                                                                                                                                                                                                                 |
| Model dependencies      | FIBO is the product of Bria's own pre-training run and is not a modification or fine-tune of another provider's general-purpose AI model. Bria discloses on a voluntary basis that the model incorporates two third-party open-weight components which Bria did not train and does not modify, and which are used with their published weights held frozen: <ul style="list-style-type: none"><li>Wan2.2-VAE, provided by the Wan Team at Alibaba Group under the Apache License 2.0, used as the variational autoencoder. Source: <a href="https://github.com/Wan-Video/Wan2.2">https://github.com/Wan-Video/Wan2.2</a>. Wan2.2 was placed on the market before 2 August 2025 and falls within the transitional period in Article 11(3) AI Act; its provider has not published a summary of training content.</li></ul> |

|                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                           | <ul style="list-style-type: none"> <li>SmolLM3-3B, provided by Hugging Face under the Apache License 2.0, used as the text encoder. Source: <a href="https://huggingface.co/HuggingFaceTB/SmolLM3-3B">https://huggingface.co/HuggingFaceTB/SmolLM3-3B</a>. Pretrained by its provider on 11.2 trillion tokens of web, code, mathematics and reasoning data. Its provider has published a summary of training content on the model card, to which reference is made.</li> </ul> <p>The data used to train these components lies outside Bria's content licensing programme and Bria makes no representation as to its provenance. Statements elsewhere in this Summary concerning the exclusive use of commercially licensed content and the absence of crawling relate to the data on which Bria trained the model.</p> |
| <b>Date of placement of the model on the Union market</b> | FIBO on or about 29 October 2025; FIBO Lite on or about 1 December 2025; FIBO Edit on or about 16 January 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

### 1.3. Modalities, overall training data size and other characteristics

*Reported for the data on which Bria trained the model. Data used by the third-party providers of the components identified in Section 1.2 is not included and is not known to Bria.*

| Modality                    | Training data size       | Types of content                                                                                                                                                                                                                                                                                                                           |
|-----------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Image                       | 479 million images       | Fully licensed images provided by Bria data partners under transactional commercial licensing agreements with rightsholders globally.                                                                                                                                                                                                      |
| Text                        | Up to 120 billion tokens | Captions describing the licensed images in the training set. Fewer than 100 million images carry long structured JSON captions covering attributes including subject, composition, lighting, colour and camera parameters; the remainder carry shorter captions. All captions are generated as metadata to enrich the licensed image data. |
| Audio /<br>Video /<br>Other | Not selected.            | N/A                                                                                                                                                                                                                                                                                                                                        |

|                                                                                   |                                                                                                                               |
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| <b>Latest date of data acquisition / collection for model training</b>            | June 2025. The model is not continuously trained on new or dynamic data after that date.                                      |
| <b>Description of the linguistic characteristics of the overall training data</b> | The structured JSON captions are in English. The SmolLM3-3B text encoder identified in Section 1.2 natively supports English, |

|                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                    | French, Spanish, German, Italian and Portuguese, which bears on the model's effective prompt language coverage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Other relevant characteristics of the overall training data</b> | <p>Bria's model weights are trained exclusively on content obtained through commercial licensing agreements with data partners globally, ensuring diverse representation across cultures, ethnicities, ages, genders and geographical locations, with balanced coverage across domain categories and content from multiple international markets. All such training data consists of human-created content with explicit commercial use releases, deliberately excluding public figures, harmful material and copyrighted fictional characters.</p> <p>This description relates to the data Bria licensed and trained on. It does not extend to the unmodified third-party components identified in Section 1.2.</p> |

## 2. List of data sources

### 2.1. Publicly available datasets

|                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Have you used publicly available datasets to train the model?</b> | <p>No.</p> <p>All training data is sourced exclusively through transactional commercial licensing agreements that expressly authorise the use of licensed content for generative AI model training. Each agreement includes warranties and representations from the licensor confirming its full legal right, title and authority to license the data objects and to grant the rights necessary for AI training applications.</p> |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 2.2. Private non-publicly available datasets obtained from third parties

|                                                                                                                                |                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>2.2.1 Have you concluded transactional commercial licensing agreement(s) with rightsholder(s) or their representatives?</b> | Yes.                                                                                                                 |
| <b>Modality(ies) covered</b>                                                                                                   | Image.                                                                                                               |
| <b>2.2.2 Have you obtained private datasets from third parties that are not licensed as described in Section 2.2.1?</b>        | No.                                                                                                                  |
| <b>General description</b>                                                                                                     | All content is sourced from rightsholders or their authorised representatives, who have obtained all necessary model |

|  |                                                                   |
|--|-------------------------------------------------------------------|
|  | releases, property releases and intellectual property clearances. |
|--|-------------------------------------------------------------------|

### 2.3. Data crawled and scraped from online sources

|                                                               |                                                                                                                                                        |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Were crawlers used by the provider or on their behalf?</b> | No. Bria does not engage in web crawling or scraping. Accordingly no crawler identifiers, collection period or domain name list falls to be disclosed. |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|

### 2.4. User data

|                                                                                                                          |     |
|--------------------------------------------------------------------------------------------------------------------------|-----|
| <b>Was data from user interactions with the AI model used to train the model?</b>                                        | No. |
| <b>Was data collected from user interactions with the provider's other services or products used to train the model?</b> | No. |

### 2.5. Synthetic data

|                                                                                                       |                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Was synthetic AI-generated data created by the provider or on their behalf to train the model?</b> | No.<br><br>Note: in accordance with the AI Office's instructions, this Section does not refer to the use of AI models to clean or enrich data, for example AI-generated metadata to enrich or modify a dataset such as creating text descriptions of images. Bria does use captions generated with third-party AI models for enrichment of its data. |
|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 2.6. Other sources of data

|                                                                                                          |                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Have data sources other than those described in Sections 2.1 to 2.5 been used to train the model?</b> | No. No offline or self-digitised sources, no datasets labelled by human subjects commissioned by the provider, and no human-generated data obtained through reinforcement learning have been used. |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 3. Data processing aspects

### 3.1. Respect of reservation of rights from the TDM exception or limitation

|                                                                                  |                                                                      |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <b>Are you a Signatory to the Code of Practice for general-purpose AI models</b> | Yes. Bria is a signatory to the General-Purpose AI Code of Practice. |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------|

|                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| that includes commitments to respect reservations of rights from the TDM exception or limitation? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Describe the measures implemented before model training</b>                                    | <p>Bria performs no crawling or scraping and does not rely on the text and data mining exception or limitation for the acquisition of training data. All training content is acquired under transactional commercial licensing agreements with rightsholders or their authorised representatives, each including warranties as to the licensor's right, title and authority to license the content for generative AI model training. Bria maintains legal verification of all licensing agreements, detailed data cataloguing systems, and regular audits of data source compliance.</p> <p>Bria nonetheless acknowledges and respects reservations of rights expressed pursuant to Article 4(3) of Directive (EU) 2019/790 and maintains systems to identify and comply with such reservations where applicable. Bria's Copyright Policy under Article 53(1)(c) AI Act is published <a href="#">here</a>.</p> |

### 3.2. Removal of illegal content

|                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>General description of measures taken</b> | <p>Bria's training data sourcing methodology inherently limits the inclusion of illegal content through the exclusive use of commercially licensed datasets obtained from verified professional data partners and established image bank providers. Each licensing agreement requires the licensor to warrant that the licensed content is original and human-created, does not infringe third-party copyright, trademark or other intellectual property rights, does not feature public figures, harmful material or copyrighted fictional characters, and is subject to all necessary model and property releases where identifiable persons or property are depicted.</p> <p>Bria operates an automated cataloguing pipeline that records each asset with a clear link to its origin, applies content moderation filtering to exclude harmful material, and subjects data partners to periodic compliance audits and remediation procedures. Training datasets are fully anonymised through removal of naming and identifying metadata.</p> |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3.3. Other information (optional)

|                                                         |                                                                                                                                                                                           |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Other relevant information about data processing</b> | <p>Bria applies C2PA Content Credentials to model outputs and holds a root on the C2PA trust list. Bria operates a patented attribution technology that measures each data licensor's</p> |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|  |                                                                                                                                                                                                                                                                                                                            |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | contribution to generated content and provides recurring compensation on that basis. Rightsholders may submit precise and substantiated complaints to <a href="mailto:legal@bria.ai">legal@bria.ai</a> ; this mechanism complements and does not limit any legal remedies available under Union or national copyright law. |
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Bria Artificial Intelligence Ltd.

# Public Summary of Training Content

Bria 3.2

Required by Article 53(1)(d) of Regulation (EU) 2024/1689 (AI Act), drawn up according to the Template annexed to Commission Communication C(2025) 5235 final of 24 July 2025.

|                               |                                                                                                                           |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Version of the Summary</b> | Version 2.0.<br>Supersedes the version first published with effect from 1 September 2025 and last updated 6 January 2026. |
| <b>Last update</b>            | 02/08/2026                                                                                                                |

## 1. General information

### 1.1. Provider identification

|                                                           |                                                                                                                                                    |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Provider name and contact details</b>                  | Bria Artificial Intelligence Ltd.<br>10 Kremenisty St., Tel Aviv, Israel<br>legal@bria.ai<br><a href="https://www.bria.ai">https://www.bria.ai</a> |
| <b>Authorised representative name and contact details</b> | Vered Horesh<br>Chief AI Strategy Officer<br>legal@bria.ai                                                                                         |

### 1.2. Model identification

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Versioned model name(s)</b> | Bria 3.2 (briaai/BRIA-3.2).<br><a href="https://huggingface.co/briaai/BRIA-3.2">https://huggingface.co/briaai/BRIA-3.2</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Model dependencies</b>      | <p>Bria 3.2 is the product of Bria's own pre-training run and is not a modification or fine-tune of another provider's general-purpose AI model. Bria discloses on a voluntary basis that the model incorporates two third-party open-weight components which Bria did not train and does not modify, and which are used with their published weights held frozen:</p> <ul style="list-style-type: none"><li>• T5 version 1.1 XXL, provided by Google under the Apache License 2.0, used as the text encoder. Bria uses the t5-v1_1-xxl variant. As documented by its provider, T5 version 1.1 was pretrained on the Colossal Clean Crawled Corpus (C4), a dataset derived from Common Crawl web data. T5 was placed on the market well before 2 August 2025 and falls within the transitional period in Article 11(3) AI Act; its provider has not published a summary of training content.</li></ul> |

|                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                           | <ul style="list-style-type: none"> <li>An open-source variational autoencoder with an f8 spatial compression factor, used for encoding images to and decoding images from latent representations.</li> </ul> <p>The data used to train these components lies outside Bria's content licensing programme and Bria makes no representation as to its provenance. Statements elsewhere in this Summary concerning the exclusive use of commercially licensed content and the absence of crawling relate to the data on which Bria trained the model.</p> |
| <b>Date of placement of the model on the Union market</b> | 10 June 2025.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

### 1.3. Modalities, overall training data size and other characteristics

*Reported for the data on which Bria trained the model. Data used by the third-party providers of the components identified in Section 1.2 is not included and is not known to Bria.*

| Modality                    | Training data size        | Types of content                                                                                                                      |
|-----------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Image                       | 479 million images        | Fully licensed images provided by Bria data partners under transactional commercial licensing agreements with rightsholders globally. |
| Text                        | Up to 19.2 billion tokens | Captions describing the licensed images in the training set, generated as metadata to enrich the licensed image data.                 |
| Audio /<br>Video /<br>Other | Not selected.             | N/A                                                                                                                                   |

|                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Latest date of data acquisition / collection for model training</b>            | June 2025. The model is not continuously trained on new or dynamic data after that date.                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Description of the linguistic characteristics of the overall training data</b> | The captions are in English.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Other relevant characteristics of the overall training data</b>                | Bria's model weights are trained exclusively on content obtained through commercial licensing agreements with data partners globally, ensuring diverse representation across cultures, ethnicities, ages, genders and geographical locations. The dataset maintains balanced coverage across domain categories while incorporating content from multiple international markets. All such training data consists of human-created content with explicit commercial use releases, |

|  |                                                                                                                                                                                                                                                                                                                                                             |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>deliberately excluding public figures, harmful material and copyrighted fictional characters.</p> <p>This description relates to the data Bria licensed and trained on. It does not extend to the unmodified third-party components identified in Section 1.2, whose training data lies outside Bria's licensing programme and is not known to Bria.</p> |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 2. List of data sources

### 2.1. Publicly available datasets

|                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Have you used publicly available datasets to train the model?</b></p> | <p>No.</p> <p>All training data is sourced exclusively through transactional commercial licensing agreements that expressly authorise the use of licensed content for generative AI model training. Each agreement includes warranties and representations from the licensor confirming its full legal right, title and authority to license the data objects and to grant the rights necessary for AI training applications.</p> |
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### 2.2. Private non-publicly available datasets obtained from third parties

|                                                                                                                                       |                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>2.2.1 Have you concluded transactional commercial licensing agreement(s) with rightsholder(s) or their representatives?</b></p> | <p>Yes.</p>                                                                                                                                                                                   |
| <p><b>Modality(ies) covered</b></p>                                                                                                   | <p>Image.</p>                                                                                                                                                                                 |
| <p><b>2.2.2 Have you obtained private datasets from third parties that are not licensed as described in Section 2.2.1?</b></p>        | <p>No.</p>                                                                                                                                                                                    |
| <p><b>General description</b></p>                                                                                                     | <p>All content is sourced from rightsholders or their authorised representatives, who have obtained all necessary model releases, property releases and intellectual property clearances.</p> |

### 2.3. Data crawled and scraped from online sources

|                                                                      |                                                                                                                                                               |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Were crawlers used by the provider or on their behalf?</b></p> | <p>No. Bria does not engage in web crawling or scraping. Accordingly no crawler identifiers, collection period or domain name list falls to be disclosed.</p> |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 2.4. User data

|                                                                                                                          |     |
|--------------------------------------------------------------------------------------------------------------------------|-----|
| <b>Was data from user interactions with the AI model used to train the model?</b>                                        | No. |
| <b>Was data collected from user interactions with the provider's other services or products used to train the model?</b> | No. |

## 2.5. Synthetic data

|                                                                                                       |                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Was synthetic AI-generated data created by the provider or on their behalf to train the model?</b> | <p>No.</p> <p>Note: in accordance with the AI Office's instructions, this Section does not refer to the use of AI models to clean or enrich data, for example AI-generated metadata to enrich or modify a dataset such as creating text descriptions of images. Bria does use captions generated with third-party AI models for enrichment of its data.</p> |
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## 2.6. Other sources of data

|                                                                                                          |                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Have data sources other than those described in Sections 2.1 to 2.5 been used to train the model?</b> | No. No offline or self-digitised sources, no datasets labelled by human subjects commissioned by the provider, and no human-generated data obtained through reinforcement learning have been used. |
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# 3. Data processing aspects

## 3.1. Respect of reservation of rights from the TDM exception or limitation

|                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Are you a Signatory to the Code of Practice for general-purpose AI models that includes commitments to respect reservations of rights from the TDM exception or limitation?</b> | Yes. Bria is a signatory to the General-Purpose AI Code of Practice.                                                                                                                                                                                                                                |
| <b>Describe the measures implemented before model training</b>                                                                                                                     | Bria performs no crawling or scraping and does not rely on the text and data mining exception or limitation for the acquisition of training data. All training content is acquired under transactional commercial licensing agreements with rightsholders or their authorised representatives, each |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>including warranties as to the licensor's right, title and authority to license the content for generative AI model training. Bria maintains legal verification of all licensing agreements, detailed data cataloguing systems, and regular audits of data source compliance.</p> <p>Bria nonetheless acknowledges and respects reservations of rights expressed pursuant to Article 4(3) of Directive (EU) 2019/790 and maintains systems to identify and comply with such reservations where applicable. Bria's Copyright Policy under Article 53(1)(c) AI Act is published <a href="#">here</a>.</p> |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3.2. Removal of illegal content

|                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>General description of measures taken</b> | <p>Bria's training data sourcing methodology inherently limits the inclusion of illegal content through the exclusive use of commercially licensed datasets obtained from verified professional data partners and established image bank providers. Each licensing agreement requires the licensor to warrant that the licensed content is original and human-created, does not infringe third-party copyright, trademark or other intellectual property rights, does not feature public figures, harmful material or copyrighted fictional characters, and is subject to all necessary model and property releases where identifiable persons or property are depicted.</p> <p>Bria operates an automated cataloguing pipeline that records each asset with a clear link to its origin, applies content moderation filtering to exclude harmful material, and subjects data partners to periodic compliance audits and remediation procedures. Training datasets are fully anonymised through removal of naming and identifying metadata.</p> |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3.3. Other information (optional)

|                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Other relevant information about data processing</b> | <p>Bria applies C2PA Content Credentials to model outputs and holds a root on the C2PA trust list. Bria operates a patented attribution technology that measures each data licensor's contribution to generated content and provides recurring compensation on that basis. Rightsholders may submit precise and substantiated complaints to <a href="mailto:legal@bria.ai">legal@bria.ai</a>; this mechanism complements and does not limit any legal remedies available under Union or national copyright law.</p> |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



Bria Artificial Intelligence Ltd.

# Copyright Policy

Article 53(1)(c) of Regulation (EU) 2024/1689

|                       |                                                                                                                      |
|-----------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Version</b>        | Version 2.0. Supersedes the version dated September 2025.                                                            |
| <b>Last update</b>    | 02/08/2026                                                                                                           |
| <b>Models covered</b> | All general-purpose AI models placed on the Union market by Bria, including the Bria 3.x family and the FIBO family. |

## 1. Copyright Compliance Framework at Bria

Our commitment to copyright compliance is fundamental to our responsible AI development. We recognise that true accountability in AI requires rigorous adherence to intellectual property rights and legal standards.

Our copyright policy reflects our core principles:

- Respecting rightsholders
- Ensuring full legal compliance
- Maintaining the highest standards of ethical AI development
- Providing equitable compensation to all data licensors through our proprietary and patented algorithmic attribution technology that measures and rewards each contributor's impact on generated content

This document outlines our comprehensive approach to copyright compliance for our general-purpose AI models placed on the market.

We have developed this policy to demonstrate our commitment to:

- Fully complying with laws and regulations on copyright and related rights, specifically Article 53(1)(c) of the EU AI Act, and Article 4(3) of Directive (EU) 2019/790 on copyright and related rights in the Digital Single Market.
- Identifying and respecting the rightsholder's reservations of rights.
- Utilising state-of-the-art technologies for copyright protection, ensuring that the model weights Bria trains are trained only on fully licensed training data. Where a Bria model incorporates an unmodified third-party open-weight component that Bria did not train, that component is identified in the Public Summary of Training Content for the model concerned, and section 4.2 below sets out the controls Bria applies to such components.
- Being committed to advancing AI technology while adhering to principles that prioritise societal benefit and accountable development.

Our approach goes beyond mere legal compliance. It represents an intrinsic commitment to integrity, transparency, and responsible innovation in our AI model development and deployment processes.

By successfully building high-quality models through sustainable data partnerships, Bria demonstrates that responsible innovation and respect for intellectual property are not only possible but also



commercially viable. This evidence is crucial for policymakers, regulators, and courts, showing there is no need to choose between fostering AI progress and protecting creators.

## **2. Training Data Compliance and Verification**

### **Licensed Data Use Policy**

Bria exclusively uses commercially licensed training data, explicitly authorised for generative AI model training, for the model weights it trains. We maintain comprehensive documentation and records of all of our licensing agreements and the authorisations provided to us by our data partners.

### **Data Source Verification**

Our data licensing process includes:

- Legal verification of all licensing agreements confirming that:
  - Bria has entered into valid and enforceable agreements with all data licensors that expressly authorise the use of licensed data for generative AI model training purposes
  - Each licensing agreement includes comprehensive warranties and representations from data licensors confirming their full legal right, title, and authority to license the data objects and grant the rights necessary for AI training applications
- Maintenance of detailed data cataloguing systems
- Regular audits of data source compliance

### **No Web-Crawling Policy**

Bria does not and will not engage in web-crawling activities, and does not use publicly accessible online content as training data for the model weights it trains. This approach substantially reduces the copyright risk associated with unlicensed training content.

Where a Bria model incorporates an unmodified third-party open-weight component, the data used by that component's provider to train it lies outside Bria's licensing programme and is not known to Bria. Such components are identified in the Public Summary of Training Content for the model concerned, together with any summary of training content published by their provider.

### **Rights Reservation Compliance**

While our business model does not involve web-crawling, we acknowledge and respect rightsholder reservations expressed pursuant to Article 4(3) of Directive (EU) 2019/790 and maintain systems to identify and comply with such reservations, if applicable.

## **3. Data Partner Compensation and Attribution Framework**

### **Fair Compensation**

We compensate partners based on their measured contribution to generated content, providing a recurring revenue stream to data partners. Bria rejects one-time licence deals for AI training data, instead implementing a fair and transparent system of ongoing compensation that ensures creators receive a share of the long-term value their work generates in existing and future AI applications.

### **Attribution Technology**



Our patented attribution technology enables Bria to bridge the gap between demand for synthetic content and supply of authentic training data. Each synthetic output generated by our models is attributed to the original content creators that had the greatest impact on its generation.

### **Transparency**

Bria's attribution technology offers transparency to both data contributors and customers.

## **4. Due Diligence for Third-Party Sources and Components**

### **4.1 Content obtained through third-party data providers**

Bria maintains comprehensive due diligence procedures for any content obtained through third-party providers. We require all third-party data providers to:

- Warrant their full legal right and authority to license content for AI training purposes
- Provide comprehensive warranties that all data licensed is original and human-created content
- Ensure all data is subject to legal releases covering commercial use and AI training applications where identifiable persons or property are depicted
- Provide representations confirming non-infringement of third-party copyrights, trademarks, or other intellectual property rights
- Provide warranties that content does not feature public figures, harmful materials, or copyrighted fictional characters
- Present all applicable compliance certifications regarding adherence to all applicable copyright laws and regulations
- Maintain detailed records and chain-of-title documentation
- Be subject to periodic compliance audits and remediation procedures

### **4.2 Third-party model components**

Bria distinguishes between third-party data sources, addressed above, and third-party model components incorporated into a Bria model.

Certain Bria models incorporate open-weight components developed by third parties, such as text encoders and variational autoencoders. Where Bria does so, those components are used with their published weights held frozen and are not modified by Bria. They are made available by their providers under open-source licences, which characteristically disclaim all warranties. The due diligence framework in section 4.1, which depends on contractual warranties from data licensors, cannot therefore be applied to them.

For such components Bria applies the following controls instead:

- Use is restricted to components released under licences permitting the intended commercial use and, where applicable, redistribution.
- The licence of each component is reviewed before adoption, and the applicable notice, attribution and licence-reproduction conditions are complied with on every channel through which Bria redistributes the component.
- Components are used without modification. Where Bria does modify a component, any applicable obligation to state changes is complied with.



- Each component is identified in the Public Summary of Training Content for the model concerned, together with any summary of training content published by its provider.
- Bria makes no representation as to the provenance of the data used by third-party providers to train such components, and its representations concerning licensed training data relate to the model weights Bria trains.

### **4.3 Data Procurement and Usage**

In addition, Bria maintains the following processes to ensure that all data licensed and used by it will not subsequently create harmful implications for rightsholders or users:

**Data Quality and Diversity:** Bria does not train its models on synthetic data generated for that purpose, whether through model distillation, alignment against another model's outputs, or otherwise. Consistent with the AI Office's instructions on the Public Summary of Training Content, this is distinct from the use of AI models to clean or enrich data. Bria does use captions generated with third-party AI models to enrich its licensed image data, as disclosed in the Public Summary of Training Content for each model. Bria does not acquire data that will not lead to model quality improvement and would only dilute the attribution to existing partners.

**Dedicated Storage and Access:** Training data for generally available models is stored in dedicated training accounts. Proprietary data provided by customers for training private models is segregated from general models' training data accounts. Access to proprietary data provided by customers for training private models, and to models informed by customers' proprietary data, is restricted to such customers and to authorised Bria support for maintenance functions only, under a rigorous permissions system. Access to models is subject to periodic penetration tests.

**Asset Cataloguing:** An automated pipeline records each asset in a dedicated catalogue, maintaining a clear link to its origin.

## **5. Output Protection and Copyright Compliance**

Bria implements robust technical and policy measures to prevent copyright-infringing outputs from our general-purpose AI models:

### **Technical Safeguards**

We employ state-of-the-art technical measures to prevent our models from reproducing training content in an infringing manner, including:

- Advanced content filtering systems
- Real-time output monitoring
- Regular testing protocols to verify safeguard effectiveness
- Detection of potential copyright violations post-generation

### **Acceptable Use Requirements**

Our terms and conditions explicitly prohibit:

- Using models to generate copyright-infringing content
- Circumventing technical safeguards



- Using our models to create any unlawful content

### **Documentation Requirements**

For all model deployments, we provide clear copyright and acceptable-use compliance guidelines, explicit prohibition of infringing uses, and technical documentation of protective measures.

### **Cross-Platform Application**

These protective measures apply consistently across direct model implementations, on-premises model integrations, API access, and all other deployment scenarios.

### **Monitoring and Enforcement**

We maintain ongoing oversight through regular audits of model outputs, compliance verification procedures, incident response protocols, and continuous improvement of safeguards.

## **6. Rightsholder Contact and Complaint System**

We maintain accessible communication channels and procedures for rightsholders, through an email message to [legal@bria.ai](mailto:legal@bria.ai), to submit precise and substantiated complaints regarding non-compliance with copyright commitments, potential infringement concerns, rights reservation violations, and any other copyright-related matters.

This reporting mechanism complements but does not replace or limit any legal remedies available under Union and national copyright law.

## **7. Other Protective Measures**

Beyond our copyright compliance framework, Bria maintains additional protective measures for the benefit of both our data licensors and end users.

### **Privacy and Data Protection**

- We place strong emphasis on privacy protection for individuals. We use human likenesses only with explicit releases for commercial use. We strictly prohibit the use of public figures' data in our models.
- We implement robust data protection measures to safeguard personal information and comply with relevant privacy and data protection regulations.

### **Identity Protection and Training Architecture**

**No Identity Mapping:** Bria's training datasets are anonymised through the removal of naming and identifying metadata. Our models are designed to prevent any mechanism for linking visual likenesses to real person identities.

**Balanced, Multi-Source Training Catalogue:** We maintain a wide-ranging, globally sourced dataset that deliberately balances input across creators, contexts, content types, and personalities. This diversity reduces the prominence of any single source and minimises the potential for overrepresentation or unintended memorisation.

**Architecture Design:** Bria's models are architected to learn general visual patterns rather than memorise or reproduce specific individuals. Our technical architecture and sampling methodology discourage identity persistence or overfitting to any single visual subject.



### **Commitment to Diversity, Inclusion, and Bias Mitigation**

- We actively seek and incorporate diverse datasets representing a wide range of cultures, ethnicities, ages, genders, and geographical locations.
- Our development process includes testing and refinement to identify and mitigate potential biases in our AI models.
- We implement content moderation filters to prevent the generation of harmful or biased content.
- We consult with diverse stakeholder groups, including underrepresented communities, and incorporate their feedback into our AI development and deployment processes.
- Our AI models are designed with cultural sensitivity in mind.
- We publish reports on our diversity and inclusion initiatives, including the composition of our datasets and the results of our bias mitigation efforts.

### **Safety, Provenance, and Mitigation of Harmful Content**

Bria applies C2PA Content Credentials to content generated by its models and holds a root on the C2PA trust list. Content Credentials are cryptographically signed provenance metadata bound to the generated file, allowing recipients to verify that the content was produced by a Bria model. Provenance metadata of this kind can be removed or lost where a file is subsequently re-encoded, converted, or stripped of metadata by downstream tools that do not preserve it. Bria is developing additional marking techniques intended to improve the durability of provenance signals across such transformations.

- We enforce strict guidelines against generating harmful or offensive content.
- We implement measures to prevent misuse of our platform. We do not accept data that features public figures or harmful content, which makes it impractical to use our models to generate these concepts.

### **Conclusion**

This Copyright Policy establishes Bria's framework for responsible AI development through five core pillars:

1. Exclusive use of commercially licensed training data, with verified legal authorisation, for the model weights Bria trains, and disclosure of any third-party model components incorporated into a Bria model.
2. Proprietary attribution technology that provides ongoing compensation to data licensors based on measured contribution impact.
3. Robust technical safeguards preventing copyright-infringing outputs.
4. Rigorous due diligence procedures for third-party data sources, and defined controls for third-party model components.
5. Accessible rightsholder communication channels for compliance concerns.

Our approach encompasses additional protective measures including privacy protection, diversity and inclusion initiatives, bias mitigation protocols, and safety measures against harmful content generation.

Through our data partner empowerment and collaboration framework, we maintain long-term partnerships that create mutual value while advancing responsible AI innovation. Many of our data licensors leverage our models to offer their creator communities and customers advanced generative AI capabilities under preferred commercial arrangements. We view our data licensors as integral to our sustainable AI development approach.



## **Contact Information**

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