

AI HARM ASSESSMENT • CONFIDENTIAL

Northbridge Lending

Scores consumer loan applications for approval and pricing

59

overall exposure / 100

Serious

RISK POSTURE BY DIMENSION

Individual harm severity58

Combines the worst realistic cost to an affected person, whether the system shapes consequential decisions, and how hard outcomes are to contest.

Population exposure67

Scales severity by how many people are reached, how openly the system is deployed, and how much it acts without a human check.

Vulnerable-group risk47

Weights presence of vulnerable populations, whether minors are involved, and sensitivity of the data being processed.

Bias & fairness gap67

Reflects untested decision systems operating on sensitive data in consequential contexts — the classic conditions for undetected discrimination.

Oversight deficit67

Measures the gap between the system's reach and the human, procedural, and organizational controls placed around it.

Jurisdictional & regulatory exposure50

Captures compliance surface across the markets the system touches, including regimes with stricter or thinner oversight.

HIGHEST-PRIORITY HARM SCENARIOS

Population exposure • Serious

Because the system reaches many people with limited human review, an error propagates widely before anyone catches it.

Bias & fairness gap • Serious

An untested decision system running on sensitive data and models stays invisible until they surface as a complaint or a lawsuit.

Oversight deficit • **Serious**

The system's reach outruns the controls around it — no clear owner, no live monitoring — so problems are found late, by outsiders.

FRAMEWORK ALIGNMENT

GAP **EU AI Act (risk tiering)**

High-stakes decisioning at scale trends toward high-risk classification and its documentation duties.

GAP **NIST AI RMF (govern / map / measure / manage)**

Named ownership, testing, and post-deployment monitoring are the four functions this framework expects.

GAP **ISO/IEC 42001 (AI management system)**

Certification hinges on a documented management system with clear accountability and review.

N/A **UNICEF / child-rights AI principles**

Where minors are users or are affected, child-specific safeguards and age-appropriate design are expected.

RECOMMENDED ACTIONS, IN PRIORITY ORDER

1. Commission independent bias/failure testing disaggregated by affected group before the next release cycle.
2. Stand up post-deployment monitoring with a defined incident threshold and response owner.
3. Name a single accountable owner for AI risk and give them a standing review cadence.
4. Run a targeted impact review with the vulnerable groups most affected, not a generic sample.

Generated by the Aethics AI Harm Assessment instrument. Scores reflect the information supplied and are a structured decision aid, not a legal determination or a certification. An IBEAI-verified assessment adds independent review of these findings.