

Acceptable Use of Artificial Intelligence

Purpose and Scope

Artificial Intelligence (which will hereinafter be referred to as “AI”) is defined as technology that enables computers and other machines to simulate human learning, comprehension, problem solving, decision making, creativity, and autonomy by having the ability to see and identify objects, understand and respond to human language, and learn from new information and experience. A hallmark of AI is that it can quickly analyze large amounts of data, act independently, and make detailed reports, recommendations, or take certain actions. In terms of business applications, most encounters with AI involve human interaction with AI tools such as virtual assistants, search engines, chatbots, generative pre-trained transformers, large language models, and notetaking tools.

The purpose of this Policy is to outline the acceptable uses of AI, the unacceptable or prohibited uses of AI, and set forth expectations for users. This Policy applies to all users of AI, including, but not limited to, all employees, whether full or part-time, contractors, consultants, interns, temporary employees, and other third parties using AI in the course of the Company’s business, whether using Company technology or personal devices, as those terms are defined herein. This Policy applies any time or place AI is used.

Statement of Risks and Expectations

AI presents certain risks to the Company by its inherent limitations or its improper use. These risks include, but are not limited to, the following:

- **Data privacy concerns:** the risk that data entered into an AI search engine or chatbot is not secure and can thereafter no longer be considered confidential
- **Inaccurate or misleading results:** the risk that information, reports, analysis, and recommendations derived from AI sources may be inaccurate or misleading, which could result in liability to the Company and/or a loss of goodwill
- **Decision-making without human review:** the risk that AI outputs, if not subjected to human review, could result in discriminatory or biased conclusions, could suggest illegal courses of action, or present other risks which could result in liability to the Company and/or loss of goodwill
- **Misrepresentation:** the risk that AI-generated content will be presented as original work without proper attribution.

It is the expectation of the Company that users of AI will exercise good judgment and act in a responsible manner in connection with the use of AI and will follow the guidelines set forth herein. Because most AI applications will involve the inputting of data into an AI tool, it is expected that users of AI will be prudent and careful in the selection of such data. It is also expected that employees who use AI will attend all Company-provided training sessions on proper AI usage and ethical guidelines. Because AI capabilities are evolving, users may not always be sure if a proposed use of AI, or a contemplated input of a dataset into an AI tool, meets the standards set forth herein.

Users who are not certain whether a particular application for AI is permissible must obtain permission from the Director of IT before proceeding.

Acceptable Use of AI

To be acceptable, use of AI must comply with the following:

- It must be used in connection with Company business for legitimate business-related purposes
- Only data which is reasonably available to the general public and is otherwise not confidential, proprietary, or legally protected from disclosure may be input into an AI tool. If a user is not certain about whether contemplated data passes this test, the user must obtain the permission of the Director of IT before submitting the data into an AI tool
- All AI-generated content must be independently verified for accuracy before it is submitted to others, and employees must obtain the permission of the Director of IT before submitting any AI-generated content to clients, vendors, or other third parties
- When AI-generated content is used, it must be clearly indicated as such, including a reference to the specific AI tool employed.

The following uses of AI are permissible and acceptable:

- Research: using AI to gather information, generate ideas, or explore potential solutions for projects
- Learning and development: Using AI-powered training platforms to enhance skills and knowledge
- Data analysis: employing AI tools to analyze large datasets, identify patterns, and make recommendations, provided the data is gathered through sources that are reasonably available to the general public and is not otherwise confidential, proprietary, or legally protected from disclosure (examples include submitting carrier appetite guides or rate data into an AI tool to analyze the differences between them)
- Content creation: AI-generated content may serve as the basis for drafting emails, reports, presentations, or marketing materials, but must always be reviewed and edited for accuracy and tone, and proper attribution must be made
- Inputting data into closed AI systems in the future: It is anticipated that closed AI systems which provide security for data input therein may be available for use in the future. When such systems are available, this provision will be supplemented with specifically-named closed AI systems authorized for the inputting of data.

Unacceptable and Prohibited Uses of AI

The Company reserves the right to determine whether any use of AI constitutes unacceptable use. The following guidelines must be observed, and failure to observe them will result in the use of AI being unacceptable and prohibited:

- Data which is confidential, proprietary, legally protected from disclosure, or which is not reasonably available to the general public may not be input into an AI tool

- AI notetaking tools may not be used unless a specific exception is approved by the Director of IT
- Sensitive or complex client interactions or questions cannot be handled entirely by AI-generated content. This prohibition includes, but is not limited to, recommendations to clients or other third parties as to coverages, levels of coverages, or whether coverage exists for a particular transaction or fact pattern
- AI-generated content may not be presented to clients, vendors, or other third parties as the original work of the submitting employee and proper In-Text Citation (APA style) must be made
- AI-generated content may not be submitted to clients, vendors, or other third parties without being independently reviewed for accuracy, bias, discriminatory results, or illegal suggested courses of action
- Decision-making must involve human review and cannot be made relying solely upon AI-generated content.