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Spellman is committed to ensuring the confidentiality, integrity and availability of the information assets necessary to conduct our business. This Artificial Intelligence (AI) Policy explains required behavior to continually protect SHV information assets.

With the increasing popularity of AI use such as OpenAI's ChatGPT and Google's Bard, it has become necessary to outline the proper use of such tools while working at SHV. While we remain committed to adopting new technologies to aid our mission, when possible, we also understand the risks and limitations of AI use and want to ensure responsible use. Our goal is to protect employees, clients, suppliers, customers and SHV from harm and loss of information and intellectual property, and unknowingly stumbling into increasing liability and/or causing legal issues.

Highlights of this Policy

- Use this policy to understand Staff responsibility for the appropriate actions necessary to use and protect SHV information assets.
- SHV has a responsibility to protect information assets that are regulated by law, in the markets we serve. Examples include, but are not limited to, the protection of personally identifiable information ("PII"), personal health information ("PHI") and payment card industry ("PCI") data.

1.0 Purpose

This document provides required behavior by SHV to ensure the protection of the information assets, systems and networks used to conduct SHV business. In addition to maintaining the confidentiality of SHV company information and the information shared by SHV business partners, SHV is subject to a variety of regulations, which specify the protection of customer data and associate data in many of our markets.

While AI can be used to perform a variety of functions. Some examples of what could be created using an AI include:

- Emails and letters.
- Blog posts, reports and other publications.
- Sales and advertising copy.
- Policies and job descriptions.
- Spreadsheet calculations.
- Foreign language translations.
- Coding development or debugging.
- Document or information sorting.
- Outlines or summaries of internal or external information.

There are, however, risks in using this technology, including uncertainty about who owns the AI-created content and security / privacy concerns with inputting proprietary SHV information or sensitive information about an employee, client, customer, etc., when interacting with the AI. Additionally, the

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accuracy of the content created by these technologies cannot be relied upon, as the information may be outdated, misleading or—in some cases—fabricated.

2.0 Scope

This policy applies to all SHV employees and third-party affiliates working on behalf of SHV within all business areas and geographic markets (“Staff”). This policy is supplemented by additional policies, standards, procedures, and guidelines, which help assign responsibility and ensure appropriate action is taken to support the principles set forth here.

3.0 Policy

Information assets in all distribution methods, types, uses, and forms – visual, written, spoken, recorded electronically, or printed – shall be protected from accidental or intentional unauthorized access, modification, disposition, or disclosure throughout the information asset life cycle to a degree consistent with the sensitivity and value of the SHV information asset. This protection includes a level of security over any device and software used to process, store, and transmit SHV information assets. Access to SHV information assets is a privilege and not a right of employees. Staff shall be accountable for the protection of SHV information assets at all times.

Due to the risks described above, all use of externally controlled, owned, or created AI while performing work for SHV is prohibited. SHV or client email addresses, credentials or phone numbers cannot be used to create an account with these technologies, and no company data of any kind, customer data of any kind, product data of any kind, intellectual property of any kind, or payment/credit card info of any kind may be submitted (copied, typed, etc.) into these platforms.

3.1 Reporting Non-Compliance and Incidents

Staff shall report all occurrences and activities that appear to conflict with any SHV policies. Reporting shall not result in public disclosure of your identity, and you shall be protected from retaliation by Human Resources and Legal.

4.0 Compliance and Enforcement

To help ensure compliance with all information security policies, SHV routinely conducts audits and risk assessments of systems and networks owned by SHV and operated by third parties, on our behalf. Staff who violate this policy, intentionally or inadvertently, may be subject to disciplinary action up to and including termination of employment or termination of services, respectively.

End of document.

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