

# AI Communication Policy

Prime Brokerage & Swaps Infrastructure Division

<b>Policy Owner</b>	Technology Leadership
<b>Effective Date</b>	1 December 2025
<b>Review Cycle</b>	Quarterly
<b>Classification</b>	Internal Use Only

## 1. Purpose

This policy explains how we use AI in professional communication. AI can make us more efficient. But it can also make people lose trust if they feel they are reading a machine instead of a person.

The question we are trying to answer is simple. How do we get the benefits of AI without losing that human touch and connection that makes communication work?

## 2. Objectives

This policy has five objectives. First, to strengthen trust in communication by keeping a human presence. Second, to ensure AI is used safely and ethically. Third, to provide clarity on what is acceptable and what is not. Fourth, to improve communication quality without creating dependency on AI. Fifth, to protect confidential information.

## 3. Scope

This policy applies to everyone in PB & Swaps Infrastructure. That includes permanent staff, contractors, and secondees.

It covers all professional communication. Emails, Microsoft Teams messages, technical documentation, code reviews, reports, and presentations all fall under this policy.

It applies to any AI tool you might use. Microsoft Copilot, GitHub Copilot, and internal AI assistants are all covered.

## 4. Definitions

**AI Assistance** means using AI to help draft, edit, summarise, or restructure content. If you paste text into Microsoft Copilot or any of UBS's internal AI assistants, and ask it to rewrite something, that counts.

**Substantive Content** means content that influences decisions. A recommendation, an analysis, a risk assessment. Not a meeting invite.

**Disclosure** means telling the reader or your audience that AI helped create the content. A short sentence is enough.

**Human Review** means actually reading what the AI produced. Not skimming. Checking that it is accurate, appropriate, and sounds like you.

**Approved Tools** means AI systems the organisation has cleared for use. Currently that includes Microsoft Copilot, GitHub Copilot, and internal AI assistants.

## 5. Guiding Principles

### 5.1 Transparency

If AI contributed to the substance of what you are saying, the reader needs to be aware of this. You do not need to disclose grammar fixes or minor edits. But if AI helped shape your argument or analysis, that is different.

### 5.2 Accountability

When you send something with your name on it, you are responsible for it. That does not change because AI helped. If there is an error, it is your error. If the tone is wrong, that is on you.

### 5.3 Data Protection

Do not put confidential information into external AI tools. Client data, trade details, and proprietary business information must stay within approved systems. This is not optional and would carry potential consequences when found out.

### 5.4 Authenticity

Some conversations need a real human voice. Performance feedback, conflict resolution, and significant business decisions are examples. These are not the right places for AI assistance.

## 6. Permitted, Restricted, and Prohibited Uses

### 6.1 Permitted Uses (No Disclosure Required)

You can use AI for routine tasks without telling anyone. Fixing grammar, checking spelling, and improving clarity are fine. So is generating templates for status updates or scheduling messages.

Drafting meeting summaries is permitted, but you need to check them against your own notes. AI often gets details wrong or invents things that did not happen.

Code documentation is allowed when you wrote the code or reviewed it thoroughly. You understand what it does, and AI is just helping you explain it.

The key principle here is that AI is polishing your work, not creating it.

### 6.2 Restricted Uses (Disclosure Required)

Some uses require disclosure. If AI contributed to your analysis or recommendations, add a short note. Something like "This document includes AI-assisted drafting and has been reviewed for accuracy" is enough.

This applies when you use AI to draft business recommendations, synthesise research from multiple sources, create technical architecture proposals, or prepare client-facing materials where AI shaped the reasoning.

The point is not necessarily to embarrass anyone. The point is that readers deserve to know when AI influenced the substance of what they are reading.

### 6.3 Prohibited Uses (Do Not Use AI)

Some things are off limits. Do not use AI to draft performance reviews, disciplinary letters, or HR communications. These require genuine human judgment and empathy.

Do not use AI for conflict resolution or grievance responses. Do not use it for regulatory submissions or audit responses without explicit approval from Compliance.

Never put confidential client identifying data, trade details, or personal information into any AI systems. This includes Microsoft Copilot, GitHub Copilot, and yes, even the internal UBS AI assistants.

Do not use AI to imitate someone else's voice or writing style. That crosses a line.

## 7. Roles and Responsibilities

Everyone is responsible for using AI appropriately. That means staying within approved tools, reviewing before sending, and asking when you are unsure.

Managers set the example. They guide their teams on disclosure expectations and model responsible use in their own communications.

Technology Leadership maintains the list of approved tools and updates this policy. They also provide training and support.

Compliance advises on regulatory implications and evaluates risk-sensitive communications.

## 8. Decision Framework

It is important that before you use AI for any communication, ask yourself five questions.

Question	If Yes
Does this involve confidential or client identifying data (CID)?	CID and personal data are strictly forbidden
Would the recipient expect my authentic voice?	Ensure substantial human contribution.
Could an AI error cause harm or reputational damage?	Verify everything. Consider disclosure.
Does this communication influence a significant decision?	Disclose AI involvement. Check all claims.
Would I be comfortable if asked "Did you use AI?" If not, reconsider your approach.	

## 9. Verification Requirements

Before sending any AI-assisted communication, you need to do five things.

Be sure to read the entire message. Does it feel authentic to you, does it say what you mean? AI often produces text that sounds confident but misses your actual point.

Ensure to verify the facts. AI makes things up, simply put, it hallucinates. It will cite papers that do not exist and quote statistics it invented. Verify anything factual against real sources.

Check the tone. AI tends to be either too formal or too casual. Make sure the message fits the relationship and context. This is a constant critique, it struggles with large contexts, especially on complex tasks.

Confirm technical accuracy. Code snippets, configuration details, and system references need to be correct.

Remove anything that sounds obviously AI-generated. Generic phrases, filler sentences, and inconsistent formatting are typically signs that need attention.

## 10. Escalation

If you are not sure whether AI use is appropriate, ask your manager, your AI champion or Technology Leadership.

If there are regulatory implications, speak to Compliance.

When in doubt, write it yourself. That is always the safe option.

## 11. Non-Compliance

The goal is not to punish people. We want to get this right. But ignoring this policy may result in a conversation with your manager, restrictions on tool access, or additional training. Serious breaches will be treated accordingly.

## 12. Policy Review

This policy will be reviewed quarterly. AI is evolving fast and our guidance needs to keep up. If you have feedback or suggestions, send them to Technology Leadership.

### Acknowledgement

I have read this policy and understand what is expected of me.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_