GENERATIVE AI POLICY

Purpose and Goals

Caylent encourages the use of Generative Artificial Intelligence and Large Language Models, however needs to balance the benefits of using such intelligence with the associated risks. This Policy establishes guidelines for the responsible use of Generative Artificial Intelligence and Large Language Models (collectively "GenAl") at Caylent. The objective is to ensure that Cayliens use GenAl tools ethically, securely, and in compliance with industry best practices, applicable laws, and regulations.

Scope

This Policy applies to all Caylent operations and applies to all Caylent employees as well as Caylent's third-party providers, including contractors, consultants, temporary employees, and other third parties performing duties on behalf of Caylent (collectively "Cayliens").

<u>Definitions</u>

"Generative AI" means AI models capable of generating novel content, such as text, images, or code, based on patterns learned from vast amounts of data.

"<u>Large Language Models</u>" or "<u>LLMs</u>" means AI models that utilize deep learning techniques to process and generate human-like language text.

"Confidential Information" means all confidential, competitively valuable, non-public or proprietary information such as code, documentation, trade secrets, templates, standards and processes, business plans, financial data, or private personal information, which are labeled as confidential, or which should be reasonably understood be to confidential in nature.

High-Level Policy Statement on Use of GenAl

- The use of GenAl tools at Caylent should be for the purposes of: (A) improving efficiency related to internal Caylent operations, (B) building GenAl solutions for Caylent clients, or (C) performing services in connection with a Caylent client project more efficiently or effectively.
- GenAl tools should not use any Caylent or client Confidential Information without express authorization as outlined in this Policy.
- Cayliens must be transparent about usage of GenAI internally and with clients.

Parameters |

Validation

- All content/outputs generated by GenAl tools (such as code or documentation) must be validated and reviewed by
 experienced and knowledgeable human reviewers before delivery to client(s) or internal use. Reviewers should have
 expertise in the domain and subject matter relevant to the content.
- GenAl code or models are subject to a validation/review/QA process, but does not require a review of all possible permutations of GenAl responses (when integrated as part of an application). A reasonable review of the output/content will be conducted as stated above.
- Only content/outputs that pass the review process will be considered acceptable for use in connection with internal Caylent operations or with client projects.

When Using GenAl for Projects Related to Internal Operations:

- General use of GenAl Tools
 - GenAI tools may be used without Confidential Information, subject to the Validation section above.

Approved GenAl Tools (when used with Confidential Information)

- i. Cayliens may use only those GenAl tools that are authorized by Caylent for use in connection with internal operations when configured according to Caylent standards. A list of the currently approved GenAl tools can be found in Notion HERE.
- ii. These GenAl tools have undergone evaluation, testing, and approval by Caylent's Al Tools Governance Committee (or any designated authority) to ensure their compatibility, security, and alignment with Caylent's internal operations.
- iii. If a Caylien wishes to use a GenAl tool that is not included in the approved list, they must seek written approval from mark.olson@caylent.com. To obtain approval, the Caylien needs to provide a comprehensive justification for the intended use, highlighting how the additional tool enhances internal operations, the benefits it offers, and any potential risks mitigated.
- iv. Approval for using a new GenAl tool will be assessed based on several factors, including:
 - 1. <u>Security and Privacy</u>: Ensuring that the tool complies with Caylent's security protocols and does not pose any risks to sensitive data or confidential information.
 - 2. <u>Compatibility</u>: Assessing how the tool integrates with existing systems and processes within Caylent's infrastructure.
 - 3. <u>Ethical Considerations</u>: Evaluating the tool's ethical implications, including potential biases and its adherence to fairness and non-discriminatory practices.
 - 4. <u>Training and Support</u>: Determining the availability of adequate training resources and technical support for Cayliens who will use the tool.
- v. Once a new GenAl tool is approved for use in connection with internal operations, it will be added to the list of approved GenAl tools posted in Notion <u>HERE</u>.

Confidentiality

Cayliens must strictly adhere to the policy that prohibits disclosing or sharing any Confidential Information through any GenAl tool without the express written consent of legal@caylent.com or the department head responsible for managing Confidential Data.

When Using GenAI in connection with Client Projects:

• Obtain Client Authorization

- i. Before incorporating any GenAI tool or content into any client project, Cayliens may need to obtain prior written authorization from the client in accordance with the terms of the MSA in place with the client.
- ii. Cayliens may use only those GenAl tools that are authorized by Caylent for use in connection with client projects when configured to Caylent standards and following the approvals above. A list of the currently approved GenAl tools can be found in Notion HERE.
- iii. These GenAI tools have undergone evaluation, testing, and approval by Caylent's AI Tools Governance Committee to ensure their compatibility, security, and alignment with Caylent's policies.
- iv. In case Cayliens (or a client) wishes to use any GenAl tools not on the approved list, they should propose the tool in the #ai-tools Slack channel and must seek internal approval from mark.olson@caylent.com. To obtain approval, the Caylien needs to provide a comprehensive justification for the intended use, highlighting how the additional tool benefits the client, and any potential risks mitigated.
- v. Once a new GenAl tool is approved for use in connection with client solutions/projects, it will be added to the list of approved GenAl tools posted in Notion HERE.

• Configuration for Data Privacy

Once consent is obtained from the client, the applicable Caylien that is using the tool is required to configure the tool so that no client-specific data or Confidential Information will contribute to the GenAl tool-vendor's training data, unless explicitly requested by the client. This measure safeguards client confidentiality and intellectual property.

Licensing and Disclosure

 Any Al-generated content developed for clients or third parties must be appropriately licensed and clearly disclosed. ii. Licensing terms should be discussed and agreed upon with the client, ensuring that the rights and usage of the generated content are well-defined and compliant with relevant legal and ethical standards, and the terms of the Master Services Agreement executed between the client and Caylent.

Transparency and Explainability

- Where feasible, Cayliens should use AI models that are transparent and provide explanations for their outputs.
- Clients and stakeholders should be informed when GenAI-generated content is used, and they have the right to
 understand the source of the content.

Ethical Considerations

- Cayliens must refrain from using GenAl tools or models that are known not to adhere to ethical principles, including fairness, non-discrimination, and respect for individual privacy.
- Cayliens must refrain from using Al-generated content to spread misinformation, engage in harmful activities, or perpetrate any form of harassment.

Reporting and Accountability

- Caylent may monitor the use of GenAl to ensure compliance with this Policy and applicable laws.
- Cayliens who identify potential ethical or legal concerns related to the use of GenAl should report them to legal@caylent.com and mark.olson@caylent.com.
- Violations of this Policy will be subject to disciplinary action, up to and including termination, based on the severity and frequency of the violation.

Subsequent Reviews

Periodic review of this Policy and continued compliance will be conducted as needed, based upon changes in GenAl technology, regulations and company requirements.

Contacts

For any questions related to this Policy, please contact <u>legal@caylent.com</u>, <u>mark.olson@caylent.com</u>, or ask in #ai-tools Slack channel or visit the applicable Notion page <u>HERE</u>.

Revision History

Original Publication: August 17, 2023

Revised: August 21, 2023