



Generative Artificial Intelligence Policy

Generative AI is a type of artificial intelligence that can create new content, such as text, code, images, or music. It does this by learning from existing data and then using that data to generate new outputs that are similar to the original data.

This Policy acknowledges the opportunities and challenges presented by Generative AI while emphasizing the importance of responsible adoption.

We are committed to:

- Using Generative AI tools that align with Capita's values and objectives responsibly, ethically, and legally and comply with the Capita AI principles.
- Respecting the rights and interests of our individual data subjects, employees, customers, clients, partners, and other stakeholders who may be affected by our use of Generative AI.
- The responsible development, deployment, and utilisation of Generative AI systems.
- Ensuring Generative AI is used to create better outcomes for our stakeholders (employees, clients, and suppliers).
- Ensuring Generative AI is used responsibly and ethically and does not create or exacerbate bias or discrimination.
- Protecting the privacy and security of the data we process.
- Adhering to our legal and regulatory obligations. e.g. data protection legislation.

Generative AI activities must align with:

- Capita Code of Conduct, Blue Book and Values.
- Related policies and standards:
 - Data Privacy
 - Data Governance
 - Artificial Intelligence and Data Privacy
 - Legal Policy

What you should expect from us

Monitor and manage security vulnerabilities and risks associated with Generative AI across Capita. In addition, we maintain various standards, which:

- Ensure Capita responds, manages, and resolves Generative AI matters in a concise & consistent way, including incident management.
- Maintain a governance framework to oversee the ongoing management of AI models, including updates, maintenance, and system improvements.
- Provide guidance, advice, training, awareness, and tools to support, create and maintain effective Generative AI platforms or solutions in line with our standards.
- Aim to minimise and mitigate reputational, legal, regulatory, people, and financial impacts on Capita and its clients.
- Monitor and escalate any non-compliance with this Policy as necessary - which may be to our audit and risk committees and ultimately to the board.

What we expect from you

- Do not use any generative AI platform (free or subscription) other than Capita-approved products for internal or client use.
- Never input offensive, discriminatory, or inappropriate content.
- Bing Chat Enterprise must only be used in a professional capacity and not for personal use.
- Personal & sensitive data must not be submitted or used with Generative AI platforms unless the appropriate Governance process has been completed and there is a legal basis for the processing.
- Protect the privacy and security of our data in a way that does not breach the privacy of other clients or suppliers or expose data to unauthorised access.
- All data used for AI interaction is to be handled in accordance with relevant data protection laws and regulations.
- Adopt a transparent approach on our use of AI.
- Establish mechanisms that ensure Generative AI output content is factually correct and in line with the Capita values.

- Abide by any relevant licensing conditions regarding intellectual property rights in the authorised Generative AI platform's terms of use.
- Ensure that third-party proprietary data or material (including any copyrighted work) is not entered into any Generative AI platform as a prompt without the third party's written permission.
- Challenge any requested use that contradicts this policy or the Capita Values.
- Report any breach of this Policy as a security incident via the Incident Reporting Process.

How we will achieve this

- Review policy compliance through Group-wide risk-based monitoring and report on Policy compliance and related risks through governance processes.
- We take Policy non-compliance very seriously. Information security is reported and managed through our governance mechanisms, which ultimately include reporting to our Group Risk Committees.
- We will periodically review and update this policy to align with evolving technologies and ethical standards.

Any breach of this policy, including misuse of Generative AI or disclosure of confidential or personal data, will be treated as a disciplinary matter.

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