

## Our Commitment to Responsible AI

Inizio is committed to prioritizing fairness, transparency, and accuracy, ensuring that artificial intelligence (“AI”) decisions do not negatively impact clients. We respect our clients right to privacy and prioritise the security of their information. We use AI to automate tasks; it will not be used to replace human decisions.

To do so, Inizio has developed a Responsible AI (“RAI”) framework supported by a suite of related processes.

## Our RAI Framework & Its Scope

### Aim of our framework

The aim of our RAI framework is to communicate how AI technology is developed and used responsibly at Inizio.

### Scope of our framework

Responsible AI applies and pertains to:

- All of Inizio’s locations, divisions, businesses, and affiliates,
- All employees, contingent workers, and contractors, and
- Any other persons who have access to Inizio information systems and AI technology.

### Our RAI Framework

We have adopted the following principles that define Inizio’s AI usage:

- **Fairness & Equity:** We commit to fairness by avoiding bias and discrimination when developing AI systems.
- **Transparency & Explainability:** The decision-making processes of AI will be clear and referenceable.
- **Outcome Accountability:** We are accountable for the outcomes of AI in our services.
- **Privacy & Security:** We take privacy and security seriously when using AI and act in accordance with relevant personal data regulations.
- **Governance:** Use of AI, and any risks in its usage, are managed as part of our wider corporate governance program, and
- **Compliance:** Our use of AI will adhere to legal and ethical standards in data protection, anti-discrimination, and other relevant requirements.

### Minimum standards and local-level exceptions

Our framework establishes responsible minimums for AI utilization by Inizio’s businesses. Local legal obligations always take precedence over this framework and its associated processes. Any exceptions to our RAI framework must be approved by Inizio’s Chief Information Security Officer.

## Our Group Functions

Inizio’s Group functions will:

- Communicate the RAI framework and related processes,
- Promote and increase the awareness of RAI,
- Prioritise privacy and data protection rules while using AI technology as defined in related Inizio policies,
- If developing AI technology, be able to demonstrate on demand the logic, data, and methods used to generate output,
- Be aware of emerging risks relating to AI,
- Ensure that AI systems are designed to provide equitable outcomes for all individuals, and
- Adhere to the relevant Inizio policies and procedures which govern or pertain to the development, procurement, and usage of AI.

## Our Leaders and Managers

Business leaders, functional heads, and managers across Inizio will:

- Support and encourage staff to adhere with the RAI framework,
- Encourage staff to provide feedback to relevant Group functional teams,
- Support Group Information Security in ensuring information assets and systems are compliant with the RAI framework,
- Ensure all RAI training requirements are fulfilled,
- Ensure that human oversight is maintained especially in critical decision-making processes, and
- Prioritise transparency and ensure that the decision-making processes of AI are clear and referenceable.

## Our People and Personnel

AI usage is the responsibility of all employees, contingent workers, and contractors who access Inizio’s information systems and AI technology. Those accessing AI technology must:

- Ensure any RAI training assigned is completed satisfactorily and within required timelines,
- Understand the information they are accessing and how to protect it from unauthorised disclosure or use,
- Understand and implement Inizio’s RAI principles while utilising AI applications, and
- Adhere to local regulations and legal requirements whilst maintaining the controls highlighted in our framework and related Inizio and business-level policy documents.

This framework, together with supportive internal processes and our Code and Commitments, govern Inizio’s responsible utilization of AI technologies. Please contact your Inizio relationship manager or [informationsecurity@inizio.health](mailto:informationsecurity@inizio.health) for further information.