Policy on Artificial Intelligence Use

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Document purpose and scope

This document sets out the Artificial Intelligence (AI) Use Policy of JBA Group Limited and its subsidiary Operating Companies, collectively known as 'JBA'. It covers activities undertaken by the Group throughout all office locations and operations worldwide.

This policy applies to all employees, contractors and third-party entities that develop, use or deploy AI technologies on behalf of the Group.

This document will be reviewed for continued suitability, will be communicated within JBA Group and, if appropriate, made available to interested parties. The review interval for this document is 0.5 years to ensure its relevance and effectiveness in addressing the evolving challenges and opportunities presented by AI.

Policy statement

We are committed to acting responsibly in our use of AI (including AI developed by JBA or by third parties). AI plays a vital role in enhancing our business operations and decision-making processes, but it is essential that AI development, use and deployment aligns with our values, legal obligations, and ethical standards.

Our use of AI will comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. This will include, but not be limited to, data protection, intellectual property, and anti-discrimination laws. We expect our business partners, suppliers and sub-contractors to operate in accordance with this policy. We will seek to comply with client policies where required and reasonably possible to do so without conflicting with our own policies or other obligations.

Aim

This policy aims to promote:

- Responsible AI use within JBA Group. The term "AI use" refers to development of AI technologies, use of AI technologies and/or deployment of AI technologies (including both AI developed by JBA or third parties).
- Transparency, accountability, and fairness in AI use across JBA Group.
- Practices that avoid the potential risks associated with AI use, such as bias, privacy concerns, loss of control of JBA's Intellectual Property, and other unintended consequences.

Responsibilities

The JBA Group Board is responsible for reviewing and approving the content and implementation of this policy and will help each Operating Company apply this policy through appropriate procedures, guidance and monitoring.

Overall compliance with the requirements of this policy is the responsibility of each Operating Company within the Group. The Managing Director of each Operating Company will oversee their company's adherence to this policy. Operating Company Directors and Management Teams are responsible for taking measures to promote this policy and help their staff to comply with its requirements.

All staff are required to comply with our policy requirements and share responsibility for our performance in implementing it.

Line managers are required to check that their staff are aware of this policy and any associated additional guidance notes.

Sub-contractors and other suppliers are expected to operate in accordance with this policy whilst representing JBA or working as a sub-contractor on our projects. The policy is available from our websites.

Implementation

Training

Employees involved in AI use will receive guidance on ethical considerations, privacy protection, and security measures related to AI.

Data Privacy, Security and IP Protection

Our AI use will adhere to our **Information Security and Data Privacy Policy**. We will comply with applicable data protection laws, regulations and contractual requirements during the collection, storage, processing, or sharing of any personal data.

We will implement robust safeguards and security measures to protect our AI use from unauthorised access, data breaches and breach of confidentiality and to prevent loss of control of JBA's Intellectual Property within third party AI.

Bias and fairness

Our AI use will adhere to ethical standards and will avoid bias, discrimination and harm to individuals or communities. Our AI use will promote fairness and inclusivity, avoiding discrimination based on any characteristic.

Transparency and explainability

We will be transparent about our AI use in decision-making processes, reporting and project work. We will be able to explain how the AI we have used works in a clear and understandable manner.

Accountability and oversight

We will establish clear ownership and accountability for our AI use.

We will regularly monitor and evaluate our AI use to make sure it is effective, fair, and in compliance with this policy.

Reporting and compliance

We encourage our employees to report any concerns related to AI use that violate this policy.

Periodically, we will conduct audits to assess compliance with this policy. We will use any findings and recommendations from audits to improve and update our AI use practices.

Approval

This document was approved by the Board of JBA Group Limited on 12/02/2024.

Executive Chair,

JBA Group