GENISTAR

Financial Freedom For All

ETHICAL & RESPONSIBLE USE OF AI

INTRODUCTION

At Genistar, we are committed to upholding the highest standards of honesty, integrity, and inclusivity in all our operations. This policy outlines the ethical and responsible use of artificial intelligence (AI) technologies within our organisation, ensuring compliance with **FCA regulations, ICO regulations including GDPR, and client confidentiality.**

AI presents significant opportunities for efficiency and innovation, but its use must be **transparent, ethical, and responsible.** This policy applies to all AI-powered tools, including but not limited to Microsoft Copilot, AI-driven automation, decision-making algorithms, and generative AI applications.

WHY IS AI BEING ADOPTED?

Genistar leverages AI to improve productivity, enhance decision-making, and provide better services while ensuring compliance with security, privacy, and ethical guidelines. The AI tools we use must meet the following criteria:

» **Enterprise-grade security and compliance,** ensuring robust data protection.
» **Transparent and explainable decision-making**, minimising risks of bias and unfair treatment.
» **Alignment with our core values**, ensuring AI enhances, rather than replaces, human expertise.

CORE VALUES FOR AI USE

All AI usage at Genistar must align with the following core values:

» **Honesty:** AI must be used transparently, ensuring all outputs are accurate, fact-checked, and traceable.
» **Integrity:** AI should support ethical business practices and should not be used to mislead or manipulate.
» **Compliance:** AI must adhere to relevant regulations, including:

- **FCA Regulations:** Ensuring AI-powered financial services align with industry standards.
- **ICO & GDPR:** Protecting personal data and ensuring AI interactions comply with data protection laws.

» **Accountability:** Employees using AI are responsible for its outputs and must verify critical data before applying it to business decisions.
» **Fairness & Inclusivity:** AI must not discriminate or reinforce harmful biases. We will actively monitor AI systems for potential bias and take corrective action where necessary.

GUIDELINES FOR ETHICAL AI USE

1. Confidentiality and Data Protection

» **Access Control:** AI tools should only be accessed by authorised personnel based on business needs.
» **Data Handling:** Ensuring proper data handling practices help to protect individuals from the following potential harms:

- **Identifiable data:** sensitive data must be anonymised where possible to protect individuals' identities.
- **Bank details:** Never enter personal details such as bank details of clients as these could be stolen or used to commit fraud leading to financial loss or damage.

- **Medical records:** Sensitive information such as medical records could be exposed, leading to embarrassment or emotional distress or even blackmail.
- **Physical harm:** in extreme cases, the mishandling of data could lead to physical danger, for example if the address of a person in a witness protection program is leaked, it could put that person in danger.
- **Discrimination:** misuse of personal data can result in discrimination. For example, if employers' access and misuse health information it could lead to unfair treatment or job loss.
- **Reputational damage:** public exposure of private information can hard an individuals' reputation, affecting their personal and professional relationships.

» **Storage and Security**: AI-generated data must be stored in compliance with GDPR and company security policies.
» **Training:** Employees will receive training on the ethical and responsible use of AI Copilot, including best practices for data protection and confidentiality.

2. Verification of AI Outputs

» **Human Oversight:** AI-generated information must always be verified before being used for client-facing or regulatory purposes.
» **Critical Decision-Making:** AI should assist but not replace human judgment in decisions that impact clients, employees, or stakeholders.
» **Fact-Checking:** Employees must cross-reference AI-generated insights with trusted sources before use. This practice helps maintain the integrity of our work and prevents the dissemination of false or misleading information

3. Risks and Mitigation Strategies

Using AI irresponsibly can pose significant risks. Key risks and mitigation strategies include:

» **Data Breaches:** AI systems must be monitored to prevent unauthorised access and data breaches which could compromise client confidentiality or violate GDPR.
» **Bias and Discrimination:** AI outputs must be reviewed regularly to detect and mitigate biases present in data to ensure fair treatment of all individuals to protect the company's reputation.
» **Inaccurate Outputs:** Employees must validate AI-generated information before using it in decision-making. This practice helps maintain the integrity of our work and prevents the dissemination of false or misleading information.
» **Over-Reliance on AI:** AI should complement human expertise, not replace it.

4. Monitoring, Compliance, and Reporting

» **Approved AI Tools:** AI-tools that are being considered for use in Genistar related work must be preapproved before use and any Genistar related content or information is added. Under no circumstances is someone to use a free AI-tool without verifying the security of any information used and that it will not be part of a publicly available LLM.
» **Monitoring AI Tools:** Approved AI tools will be regularly audited to ensure compliance with this policy.
» **Accountability:** Employees are responsible for any misuse of AI and may be subject to disciplinary action for non-compliance.
» **Reporting Violations:** Any concerns or breaches must be reported to your line manager or the compliance department.
» **Continuous Improvement:** Feedback will be collected to refine AI policies and ensure responsible use as AI technology evolves.

5. Acceptable and Unacceptable AI Uses

Improper use of AI tools can undermine our core values and can lead to severe legal and reputational consequences. It is essential to use AI responsibly and ethically to maintain the trust of our clients and uphold our firm's integrity.

Examples of Responsible AI Use:

- ✔ Automating repetitive tasks to improve efficiency.
- ✔ Using AI for trend analysis, provided insights are verified.
- ✔ Enhancing customer support with AI-driven chatbots under human supervision.

Prohibited AI Uses:

- **x** Only approved AI tools can be used within Genistar when adding Genistar related content or information.
- **x** Using AI to generate misleading or deceptive content, such as fake reviews or testimonials.
- **x** Relying solely on AI for financial or legal advice without human validation.
- **x** Profiling individuals based on sensitive attributes (e.g., health conditions, ethnicity) in ways that may lead to discrimination.
- **x** Manipulating AI to create false data or reports to gain unfair business advantages.

CONCLUSION

AI is a powerful tool that, when used responsibly, can enhance productivity and decision-making. Genistar is committed to ensuring AI is used ethically, transparently, and in alignment with regulatory standards. By adhering to this policy, we will harness AI's potential while safeguarding our clients, employees, and stakeholders.

This policy will be reviewed and updated regularly to reflect advancements in AI and regulatory changes.

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