Artificial Intelligence (AI) Policy

Section: Information Technology
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GUEST SERVICES
Legendary Hospitality Since 1917

1. Introduction

The purpose of this policy is to promote the responsible use of Artificial Intelligence ("AI") applications to improve our services, operations, and customer experiences while maintaining the highest standards of legal compliance, ethical conduct, data protection, and accountability.

Guest Services, Inc. ("Guest Services" or the "Company") uses AI applications to support innovation and better decision-making, not to replace sound judgment, fairness, or our obligations to customers, team members, and the communities we serve. Every AI initiative should advance business objectives, respect individual rights, protect Company and customer information, and be governed by clear responsibility, disciplined oversight, and continuous improvement.

However, the use of AI applications also presents new challenges in terms of information security and data protection. This policy is a guide for team members on how to be safe and secure when using AI applications, especially when it involves the sharing of potentially sensitive Company and customer information.

2. Definition of AI Tools

AI Tools are software applications that use artificial intelligence to automate tasks, analyze data, create content, and solve problems. Examples of AI Tools include (but are not limited to) generative AI assistants such as Copilot, Claude, ChatGPT, Gemini, Alexa, and Siri. AI Tools also include internet search engines such as Google, Bing, Yahoo! Search, and others.

3. Acceptable Use

Guest Services has determined that **Microsoft Copilot/Chat is the Company standard** when completing any Company work-related tasks. Team members should be logged into their Guest Services Microsoft 365 account (not a personal Copilot/Chat account) when using Copilot/Chat. **No other AI software is sanctioned to be used for Company work** without the approval of the Information Technology ("IT") Department. If a team member wants to use an alternative AI Tool, they should submit a request in Workday by using the *Create Request* function and use the Software Approval Form request.

Further, the use of AI Tools must be done using a Guest Services configured computer. This will assist in keeping Company information as secure as possible.

4. Confidential Data

Team members are permitted to use Microsoft Copilot/Chat on a Guest Services configured computer, because Copilot/Chat is a closed system whereby the information is never shared with the internet. To protect the Company's confidential information, team members should never use an unapproved AI Tool or upload or share any confidential, proprietary, or protected data with an internet search engine. This includes data related to customers, team members, or partners. Similarly, team members must ensure that confidential or copyrighted information of a third party is never shared outside of Copilot/Chat. In addition, credit card, bank account information, social security numbers, Personal Health Information (PHI) or Personally Identifiable Information (PII) should never be entered into any AI software, including Microsoft Copilot/Chat or any internet search engine.

5. Access Control

Employees must not give access to AI Tools to anyone outside the Company without prior approval from the IT Department. This includes sharing login credentials or other sensitive information with other team members or third parties.

6. Use Discretion

Team members should be aware that many AI Tools are prone to "hallucinations", false answers, or information that is stale or out-of-date. AI-generated content may not be relied upon as the sole basis for business decisions, financial reporting, legal conclusions, customer communications, regulatory filings, or contractual commitments without detailed human review and approval. Team members are responsible for the content they subsequently communicate – not the AI Tool that is used.

7. Prohibited Uses

7.1 Use of AI in Employment Decisions

In no circumstances may an AI Tool be solely used for any employment decision (including but not limited to hiring, promoting, disciplining, or termination of employment), without the approval of the Human Resources or Compliance Department.

7.2 Fairness and Non-Discrimination

The use of AI Tools must not perpetuate anything, that is:

- Threatening
- Discriminatory
- Obscene
- Libelous
- Intimidating
- Harassing

7.3 Other Prohibited Uses of AI

- The use of AI-generated content in advertising, promotion, or social media posts.
- The use of AI to respond directly to guest comments, emails, or social media posts.
- Any use of AI that violates an existing trademark, copyright, or third-party intellectual property.
- Sharing of confidential Company or personal information such as Personally Identifiable Information (PII) or Protected Health Information (PHI).
- AI-generated analyses, journal entries, accounting conclusions, forecasts, financial models, tax positions, or financial statement disclosures unless reviewed and approved by a human in accordance with existing internal control procedures.

8. Work Product

The use of AI Tools, like all other software provided by the Company, is considered to be a part of every team member's normal job duties. Therefore, the product of any AI Tool used by a Guest Services team member is considered work product in the course of employment, and as such, the work product remains the property of Guest Services.

9. Compliance

Team members may not use Company equipment or software, including AI Tools, for personal use. The use of AI applications must comply with all applicable laws, regulations, contractual requirements, and customer obligations, including privacy, employment, consumer protection, and intellectual property laws.

10. Reporting

Any suspected misuse of AI or violation of this policy must be reported immediately to the Information Technology or Compliance Departments.

11. Governance

11.1 Guest Services retains the right, at any time and for any reason, to view any team members' work using an AI Tool, or grant or deny the ability to use an AI Tool.

11.2 Any questions about this policy or the use of any AI Tools should be directed the Information Technology or Compliance Departments.

11.3 Any team member found to have violated this policy is subject to discipline up to and including termination.

11.4 Guest Services reserves the right to modify this policy at any time as the Company deems appropriate.