



AT&T Artificial Intelligence (AI) Policy

Audience:

This <u>Policy</u> applies to all AT&T employees and third parties involved in creating and using AI tools, systems, solutions, and activities.

Why does this policy exist?

Since 2019, we've adhered to our **AT&T AI Guiding "Principles"**. This **AT&T AI Policy** clarifies how AT&T will apply those principles to work activities including our use of Generative AI and Ask AT&T. This Policy does not alter or replace other applicable AT&T policies, standards, and quidelines.

Roles & Responsibilities:

Employees who violate this policy may be disciplined, up to and including termination of employment. AT&T will also make reasonable efforts to contractually bind third parties to operate consistently with this Policy, using a risk-based approach.

If in doubt, Ask!

This policy does not cover every situation. If you are unsure whether a situation could violate this policy, seek guidance from Ask Compliance (askcompliance@att.com).

Requirements:

USE OF GENERATIVE AI, INCLUDING ASK AT&T

- Only use Generative AI tools approved by AT&T for work-related purposes. Never use external Generative AI tools in lieu of AT&T sanctioned tools (e.g., use Ask AT&T instead of ChatGPT).
- 2. Never enter any AT&T, customer, or third-party proprietary information into external Generative AI tools or platforms.
- Comply with all existing review processes for external communications, including Legal review and approval, before sharing written text, images, videos, or music created by Generative AI outside of AT&T.
 - o Note: This requirement does not apply to written text generated by the Microsoft Office suite of products (e.g., Outlook, Word, PowerPoint).
- 4. Ensure you have a license to share images, videos, or music created by Generative Al before it is shared with an internal AT&T audience larger than 100 employees. When in doubt, check with Legal.



- 5. Ensure all software code created by Generative AI complies with <u>AT&T's Freeware</u>, Shareware, and Open Source Software Policy.
- 6. Review the output created by Generative AI for accuracy, professionalism, reasonableness, obvious third-party content, and potential bias before you use it. You are accountable for the content, use it wisely.
- 7. Be transparent when you use Generative AI by citing its use in your work product. Example: "AI Assisted"
- 8. Consult with your business unit sponsor for any use of Generative AI to set criteria (like extending credit or making service offers), make predictions, or engage in decision making related to AT&T's customers, employees, service providers, or contractors.
- 9. Contact your business unit sponsor if you want internal Generative Al trained on a new data set.

New, Repurposed or Significant Changes to AI Systems and Solutions

For each Al Solution (initial or repurposed) you must:

- 1. Complete an AI Risk Self-Assessment. AI Solutions must be categorized as no, low, medium, or high risk. The Self-Assessment will consider the following Key Risk Areas: Law, Unfair Bias, Privacy, Accessibility, Consequential Use Cases, Health & Safety, and Cybersecurity. If the Self-Assessment identifies no or low risk, the proposed use of the AI Solution must be documented and may proceed without further review. If a medium or high risk is identified, work with your business unit sponsor for escalation, and appropriate reviews and approvals on the proposed use before you proceed.
- 2. Your business unit sponsor will engage the Al Governance process, which can be initiated by filling out an Al Governance Front Door Questionnaire.
- 3. Document or inventory the Al Solution in MLFlow.

Realizing the Principles:

The Business Unit and AI Governance bodies must consider technical and non-technical methods to implement this Policy. Business units may add additional, unit-wide governance/requirements (e.g., policies, standards, guardrails) to address these areas, which may be established by the business to help facilitate implementation of this Policy. Risk mitigation techniques/tools may vary by application/use case. The categories of mitigation measures described below will not be necessary for every use of an AI Solution; however, each should be deployed where appropriate and to the extent technically feasible, relevant, and effective and based on the level of risk.

Because AI may be used in many ways and for many purposes, it is important we adhere to the following principles:



Category	Description
Transparency	Publicly disclose relevant, general information that summarizes how the business uses Al Solutions in language that is reasonably understandable. Internal to AT&T, cite the Al (Generative Al) tool used in your work. Make sure to cite in any document, presentation, etc., when Generative Al tools are used. Note: using an Al tool in the development process is not the same as a product having Al in it. Be cautious when claiming or labeling something is "Al-enabled."
Human	Subject AI Solution to appropriate human oversight for unfair biases, performance
Oversight	issues, inaccuracies, offensiveness, and other defects.
Data Quality	Make reasonable efforts to identify and mitigate against the use of data containing unfair biases, malicious information, inaccuracies or other errors, and outdated or incomplete data, regardless of the data source, i.e., first- or third-party data, generated by AT&T or received from a source outside of AT&T. Take reasonable steps to promote the use of datasets in both training data and production data that reflect and represent the diversity of the stakeholders foreseeably affected by each use of an Al Solution. Confirm with Legal that AT&T has appropriate IP rights or permissions to train Al with third-party data.
Team Diversity	Consistent with existing AT&T employment policies and practices, take reasonable measures to include diversity as a factor in selecting personnel to work on and/or review AI Solutions. Place a greater focus on this measure where there is an indication of a material risk of unfair bias.
Robustness & Resilience	Al Solutions should be developed and maintained in a manner reasonably designed to render them resilient against the presence of other agents (human and artificial) that may interact with the Al Solution in an adversarial manner.
Reproducibility	Al Solutions should produce the same (or non-deterministically similar) results when repeated under the same conditions. This measurement can be obtained with stated precision by a different team using the same measurement procedure, the same measuring system, under the same operating conditions, in the same or a different location across multiple trials.
Collaboration & Sharing	To the extent deemed appropriate, participate in appropriate industry-wide forums (including open source), designed for Al actors to collaborate on and develop open standards, sharing tools, methods, and models for trustworthy Al.
Ethical Al Training	To the extent deemed necessary and appropriate, require training consistent with this Policy for AI Practitioners.
Monitoring & Assurance	Periodically subject an appropriate sample of Al Solutions to internal monitoring. Monitoring processes should be as transparent as possible.
Explainability	Establish and maintain the capability to explain an individual outcome in reasonably understandable terms, upon request by a person claiming harm from the output of an Al Solution, how and why the Al Solution provided the output.
Disclosure	When an Al Solution emulates a human, notify individuals interacting directly with the Al Solution that they are dealing with a machine instead of a person.
Opportunity to Challenge & Seek Redress	For uses of Al Solutions where it is reasonably foreseeable that outputs may, in some circumstances, unintentionally cause a materially adverse effect on a person or group of people, provide to all stakeholders who may be foreseeably affected by



	the use of the Al Solution notification that an Al Solution is being used as part of the decision-making process, as well as an opportunity to challenge the decision and seek appropriate redress.
Traceability	Clearly document the intended purpose(s) and/or repurpose of AI Solution uses. Clearly document objectives, underlying assumptions, and the desired and undesired outcomes for the expected individual, or group of individuals, expected to use/consume/be affected by the use of AI Solutions. Create and maintain a written record of practices used and actions taken throughout the lifecycle of AI Solutions, at a feasible level of detail.
Tools & Processes	Use tools and processes designed to mitigate the risks of unfair or unintended bias and inaccurate output, and to record significant decisions made by humans and machines, in the creation, implementation, and refinement of models and outputs. Provide users with the ability to provide feedback, where appropriate, as such feedback is critical to improve the product and its underlying technology.

Definitions:

Al System: A machine-based system with a component of machine learning or autonomous reasoning and/or decision making that can, for a given set of human-defined objectives, train on data and develop models to make predictions, recommendations, or decisions influencing real or virtual environments. Excludes rules-based automation.

Al Solution: An application of one or more "Al Systems" to solve a human-defined problem or achieve a human-defined goal.

Generative AI: refers to a type of artificial intelligence that can create new and original content, such as images, music, text, or software code without being explicitly programmed to do so. This is achieved using deep learning algorithms that are trained on large datasets of existing content, allowing the AI to learn patterns and generate new content that is similar in style or structure. (e.g., Conversational AI, Ask AT&T, Text to Image AI, AI Audio Enhancing Speed, AI Music Creators, AI Voice Generators, AI Powered Code Generators). View more terms and definitions here.

Policy Owner & Manager

Chief Privacy Office, Director-Privacy Mary Kay Thurlkill, MR2369

Date:

Effective: January 2021 Updated: July 2023 (v3.1)

- Updated all links to be accessible for Suppliers
- Removed Other Related Policies, Information & Supporting Documents

Policy Location:

Supplier Policies [https://attsuppliers.com/SupplierPolicies.asp]