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Artificial Intelligence Policy		

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I. PURPOSE

The purpose of this Policy is to establish requirements for the appropriate and responsible use of artificial intelligence (AI) while allowing for the exploration of AI in order to pursue potential business benefits to Aramark. This technology is rapidly evolving, and all use cases cannot be predicted. In developing this policy, we are mindful of balancing risks associated with AI – including legal and reputational risks – with the risk of ceding benefits to competitors by failing to leverage this new technology.

This Policy seeks to provide key principles to guide our approach and will be updated as needed. The materials on the [Artificial Intelligence page of MyAramark](#) provide specific examples and guidance and are incorporated by reference into this Policy.

This Policy applies to Aramark employees, agents, contractors, consultants, business partners, and workers at Aramark, including all personnel affiliated with contracted suppliers (collectively, “Users”) who have access to Aramark or client information systems; interact with Aramark or client information assets; or access, use, store, retrieve, transmit, or otherwise process Aramark or client data, and may use AI tools in any capacity related to Aramark’s business. This Policy

supplements the [Business Conduct Policy \(BCP\) and its supporting policies](#), and is informed by our [Human Rights Statement](#) and the [NIST AI Risk Management Framework](#).

II. DEFINITIONS

- a) **AI Risk Governance Committee:** A cross-functional team of stakeholders (including IT, Information Security, Legal, Compliance, Human Resources, Supply Chain, Risk Management, Communications, and International) created in May 2023 to govern the use of AI at Aramark.
- b) **Architecture Review Board (ARB):** A team of IT architects who consult, advise and review technology. The board evaluates new technology solutions that are introduced to the Aramark technology ecosystem.
- c) **Artificial Intelligence (AI):** The ability of machines to perform tasks generally associated with human intelligence, such as reasoning and learning. For purposes of this Policy, this includes but is not limited to generative AI, which is capable of generating new content such as code, images, text, simulations, videos.
- d) **Confidential Information:** Aramark or client sensitive, personal, or proprietary information, including consumer and employee information as well as non-public financial information about Aramark. For specific guidance on what constitutes Confidential Information, consult the [Artificial Intelligence page of MyAramark](#).
- e) **Public AI System:** An AI system that is publicly available, such as ChatGPT. Any content entered into a Public AI System is not private. User input may be used by Public AI systems to further train the model and could be publicly shared with other users.
- f) **Aramark-Approved AI System:** An AI system that is provided or approved by Aramark.
- g) **Unapproved AI System:** An AI system that has not been approved by Aramark.

III. POLICY

The use of AI for business purposes must comply with applicable law, the BCP, and supporting policies. Applicable provisions from the BCP include, but are not limited to:

- Confidentiality of financial and proprietary information
- Data privacy and information security
- Employment and equal opportunity
- Insider trading
- Copyright infringement and software piracy

The following key principles apply:

- AI is not a substitute for human judgment and decision making; you are responsible for your work product and any decisions you make that are based on AI.

- NEVER download or use a Public AI System or Unapproved AI System on an Aramark device, or for work purposes on any device.
- NEVER use Aramark credentials to register for a Public AI System or Unapproved AI System.
- NEVER enter or connect any Confidential Information into a Public AI system or Unapproved AI System.
- Always engage the ARB in the planning stages for any new vendors using AI, or existing vendors that have not previously used AI to receive guidance on approved solutions.
- Always involve Supply Chain when engaging with any existing or potential vendor or service provider at every stage of the process.
- Copyright restrictions may apply to content integrated into or generated by AI.
- If you are not sure whether using AI is permissible in a situation, STOP and seek assistance by submitting a question to the [AI Inquiry Mailbox](#).

Consult the [Artificial Intelligence page on MyAramark](#) for guidance, including examples of potential use cases.

The AI Risk Governance Committee will establish appropriate processes for the approval of AI use cases, vendor management, use of data for model training purposes, and handling of ideas, questions and concerns. Exceptions to this Policy may be granted on a limited basis by the AI Risk Governance Committee in consultation with the Legal Department.

IV. CONSEQUENCES OF NON-COMPLIANCE

Any employee, regardless of position or title, who violates any provision of this Policy, may be subject to discipline, up to and including termination of employment. Contractor and agent violations may result in termination of assignment at Aramark and/or termination of any agreement with the vendor.

V. REPORTING AND PROTECTION FROM RETALIATION

Aramark encourages individuals to speak up when they see or suspect policy violations or violations of law. Individuals will never be subject to retaliation for reporting a suspected violation as long as they act in good faith and with a reasonable belief that the information they are providing is true. To submit an issue in the United States, you can use the Aramark Hotline website form at www.aramarkhotline.com or call 1-877-224-0411. Internationally, you may use the form at www.aramarkhotline.com or contact one our international numbers available at www.aramarkinternationalhotline.com. For more information about the Aramark Hotline and other ways to raise a concern, review Aramark’s [BCP](#) for Resources for Voicing Questions or Concerns.

Owner / Author	Chief Compliance Officer; Chief Information Officer
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Approved by	<p>ARAMARK RISK GOVERNANCE COMMITTEE: Tamsin Fast, Chief Compliance Officer; Baker Smith, Chief Information Officer; Aaron Skrypski, VP and Assistant General Counsel, Privacy & Technology; Dustin Martino, Assistant General Counsel and Director of Compliance; Nick Kournetas, VP Compliance; Shawn O’Shea, Chief Information Security Officer; Ainhoa Pozzi Gonzales, VP and Assistant General Counsel, Latin America; Justin Kuresko, Principal Enterprise Architect, IT; Rob Rambo, VP Global Risk Management; Chris Collom, VP Corporate Communications .</p>
Interdependent policies & trainings	<p>Business Conduct Policy; Global Supplier Code of Conduct; Global Acceptable Use Policy; Global Data Classification Policy; System Development Policy, Global Software Usage Policy; Equal Employment Opportunity and Affirmative Action; Loss, Disclosure or Unauthorized Access of Personal Information; Social Networking Policy</p>
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