



# AI USE & RISK MANAGEMENT STATEMENT

Effective 11.25.25; Updated 2.14.26

## 1. Purpose

This statement describes Ethics Suite's use of limited AI-enabled functionality, its associated risk posture, and the governance controls in place to ensure responsible use. Ethics Suite's approach is informed by a risk-based interpretation of the NIST AI Risk Management Framework (AI RMF) and is designed to enhance usability and efficiency while minimizing risk to individuals, customers, and the organization.

## 2. Scope of AI Use

Ethics Suite's AI functionality is currently limited to a controlled text summarization feature used to generate high-level issue summaries based on reporter-provided content. AI-generated outputs are assistive in nature and are intended to support human review and analysis. Ethics Suite does not use AI for automated decision-making, profiling, scoring, eligibility determinations, or actions that produce legal, financial, employment, disciplinary, or academic outcomes. AI is not used to replace human judgment, and all outputs are reviewed and acted upon by authorized users.

## 3. Data Processing and Use of Third-Party AI Services

The AI summarization feature leverages advanced language processing technology provided by OpenAI. When this feature is enabled and used, input data—which may include personal data provided by the reporter—is transmitted to OpenAI solely for the purpose of generating a summary. OpenAI does not use data submitted through this feature to train or improve its models. Data is not retained by Ethics Suite during processing and is handled in accordance with OpenAI's security controls and retention limitations, which provide for temporary retention solely for abuse and misuse monitoring, after which the data is automatically deleted unless otherwise required by law. Ethics Suite does not access or retrieve data during any such temporary retention period.

Prior to generating an AI summary, users may review and modify the underlying issue text, including anonymizing or pseudonymizing data or removing personally identifiable information. Use of the AI summarization feature is optional and may be disabled by the customer at any time through administrative settings.

## 4. Risk Classification

Based on its limited scope and implementation, Ethics Suite's current AI use is classified as low risk. AI functionality is human-initiated and subject to human review, with



deterministic system behavior outside of the summarization output. The AI feature does not independently take action, influence outcomes, or materially affect individuals' rights, access, or opportunities. Ethics Suite does not rely on AI outputs as authoritative or determinative.

## **5. Risk Controls and Safeguards**

AI functionality is restricted to predefined, approved use cases and does not operate autonomously. Human oversight is required for all AI outputs, which are advisory only. Customer data processed through the AI feature remains subject to Ethics Suite's existing security, confidentiality, data protection, and retention controls. AI systems are not permitted to perform automated actions, trigger workflows, or make determinations without human involvement.

## **6. Governance and Oversight**

AI functionality is reviewed and approved by Ethics Suite's technical leadership prior to deployment. Any proposed expansion of AI capabilities is subject to documented risk review and internal approval. AI use and associated controls are reassessed as part of ongoing product, security, and compliance reviews to ensure continued alignment with Ethics Suite's risk tolerance and regulatory obligations.

## **7. Consent and Customer Control**

Use of the AI summarization feature is subject to customer consent. By enabling and using the feature, customers acknowledge and consent to the processing of data as described in the AI Feature Data Processing and Consent Statement. Customers retain control over feature activation and may disable AI functionality at any time through administrative configuration.

## **8. Future Alignment with the NIST AI Risk Management Framework**

If AI functionality expands beyond its current low-risk summarization use case, Ethics Suite will conduct a formal AI use-case and risk assessment. Risks will be mapped to the NIST AI RMF core functions—Govern, Map, Measure, and Manage—and proportionate technical and procedural controls will be implemented. AI risk mitigation measures will be documented and incorporated into existing governance and security frameworks.

## **9. Review and Continuous Improvement**

This statement is reviewed periodically and updated as AI functionality, regulatory expectations, or risk considerations evolve. Formal alignment with the NIST AI Risk Management Framework will be initiated within six months of any expansion into higher-risk AI use cases, with appropriate controls implemented on a risk-based timeline.