

Responsible AI Policy

At Probe Group we recognise the potential for data and artificial intelligence (AI) to transform customer experiences and enhance our services and our operations. As a leading provider of customer service and digital solutions, we understand the critical role that exceptional customer experiences play in driving business success and enabling our clients to connect with their customers in an efficient, effective and personalised way. In the course of the Probe Group integrating more AI into our daily operations as well as our offerings to clients, we aim to do so in a responsible and ethical manner.

Purpose

This policy outlines the principles we follow for the responsible and ethical use of data in conjunction with AI and analytics at Probe Group to serve clients and their customers, and our employees, partners and stakeholders. Probe's vision is to unlock new levels of innovation and excellence delivering value for our clients and their customers, and this policy guides the behaviours of our teams and their decisions in relation to data and AI use, from partner selection, solution design and implementation to commercialising and operationalising the solutions. This policy is intended to align with Australia's AI Ethics Principles and leading industry practices.

AI Principles

These are the principles we follow when considering the ethical and responsible use of data in conjunction with analytics and AI techniques:

1. **Security and privacy:** We deploy security controls designed to keep data secure and observe our clients and their customers' privacy at all times, and support them with the means to do the same. We will collect and use data responsibly in conjunction with AI and analytics.
2. **Open and honest:** When clients sign up to our products and services, we will inform them of the benefits, and how data will be used to enable the benefits. Probe strives to take all reasonable measures to implement AI systems that are appropriately transparent and explainable.
3. **Benefits and enablement:** We are committed to using the data we hold to implement AI systems intended to benefit our clients and their customers, as well as providing them with

insights and recommendations to help them use data and AI in a responsible and ethical manner.

4. **Control and consent:** We provide our clients with control over their data and the ability to manage access to their data by the various AI systems to deliver better services to them and their customers.
5. **Quality and impact:** We are committed to conducting thorough assessments of the algorithms and underlying data used in the AI system across a range of quality measures, such as fairness and accuracy, as well as the potential impact of the solution or its output on decision making and actions.
6. **Accountability and governance:** We are committed to working collaboratively with our clients to deploy appropriate governance measures to enable effective human oversight of AI systems with clear accountability across the AI lifecycle.
7. **Trusted partner ecosystem:** We expect our partners (such as suppliers and subcontractors) to share our approach to responsible and ethical data and AI use commitments. We will conduct regular reviews of our partner ecosystem to validate adherence with our commitments and take appropriate actions to achieve compliance as required.

By adhering to these principles, we are confident that we can harness the potential of AI technologies to drive positive outcomes for our clients and our people while developing solutions which are safe, secure and reliable.

Risk Based Approach

At Probe Group we recognise that the responsible and ethical use of data and AI requires a proactive approach to identify, assess and mitigate potential risks associated with the use of AI technologies. Our risk based approach to use of AI is founded on the principles set out in this policy. We begin by systematically identifying potential risks associated with a case-by-case use of AI in our operations. This includes considering risks related to bias and fairness, privacy and data protection, security vulnerabilities, transparency and accountability. We engage with cross functional teams including data scientists, legal, information security and business stakeholders to conduct risk assessments and identify potential areas of concern.

Once risks are identified, we assess their likelihood and potential impact on our operations, our people and our clients and their customers. We develop and implement risk mitigation strategies to address the identified risks and minimise their impact on our operations and stakeholders. This may involve a combination of technical controls, process improvements and

training initiatives.

AI Risk and Ethics Committee

At Probe Group we have established an AI Risks and Ethics Committee to oversee the responsible and ethical use of AI technologies across our organisation. This committee comprises cross functional experts including digital, risk, information security, legal and data scientists. The primary role of the committee is to provide guidance, oversight and governance to ensure that our AI initiatives align with our principles and commitments in this Policy, and comply with regulatory requirements. The committee meets once a quarter. By leveraging diverse expertise and perspectives, the AI Risk and Ethics Committee plays a crucial role in promoting transparency, accountability and trust in our AI practices and Probe Group and contributing to the positive impact of AI on our clients and our people.

Continuous Improvement

Our commitment to responsible and ethical data and AI use extends beyond the initial implementation phase. We will establish comprehensive monitoring and evaluation mechanisms to continuously assess the performance and impact of our AI systems. This includes gathering feedback from clients and our people and conducting regular audits to enable compliance with this policy and regulatory requirements.