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Artificial Intelligence Policy

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SUMMARY

You are responsible for any work product, decision, or action that results from your use of AI.

- Use only Aramark-approved AI tools for work.
- Protect Aramark, client, employee, and customer information.
- Review AI outputs before relying on them. You are the human in the loop.
- Consult the AI page on MyAramark for guidance.
- Ask for help when you are unsure.

I. PURPOSE

The purpose of this Policy is to support Aramark's pursuit of innovation with thoughtful and balanced requirements for the responsible use of artificial intelligence (AI) at Aramark.

This Policy provides key principles for using AI at Aramark and will be updated as AI tools and risks continue to evolve. Consult the Artificial Intelligence page of MyAramark for updated materials, practical examples, approved-tool guidance, and instructions.

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This Policy applies to Aramark employees, agents, contractors, consultants, business partners, and workers at Aramark, including personnel affiliated with contracted suppliers, who may use AI tools for Aramark business or who have access to Aramark or client systems, information assets, or data. 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 (AIRGC):** A cross-functional team of stakeholders (including Technology, Cybersecurity, Legal, Compliance, Human Resources, Supply Chain, Communications, and Audit) and representation from our business sectors who oversee the risk mitigation strategy for the use of AI at Aramark.

b) **AI Security & Governance:** Function within Aramark's Cybersecurity organization that advises on AI Systems and leads the AI Approval Process in coordination with the Architectural Review Board, with advisement from the AI Risk Governance Committee.

c) **AI Approval Process:** The procedures Aramark uses to review and approve AI use cases, Aramark-Approved AI systems, vendor management, the use of data for model training, and the handling of AI-related ideas, questions, and concerns. The AI Approval Process is published on the AI page of MyAramark and may be updated from time to time.

d) **Architecture Review Board (ARB):** A cross-functional team led by Technology that consults, advises and reviews new technology solutions that are introduced to the Aramark technology ecosystem.

e) **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: (i) generative AI, which is capable of generating new content such as code, images, text, simulations, and videos; (ii) machine learning, which enables systems to learn patterns from data and improve performance without being explicitly programmed for each task; and (iii) agentic AI, which involves autonomous systems that can reason, plan, use tools, maintain memory, and take actions to accomplish goals.

f) **Sensitive Information:** Internal, Confidential, and/or Restricted Data as defined by Aramark's Global Data Classification Policy.

g) **Public AI System:** An AI system that is publicly available and not provisioned by Aramark. Content entered into a Public AI System is not private and may not be protected by Aramark controls. Examples include, but are not limited to, OpenAI ChatGPT, OpenClaw, Genspark, and similar publicly available AI tools.

h) **Aramark-Approved AI System:** An AI system that has been reviewed by the ARB, provisioned, and approved by Aramark.

i) **Unapproved AI System:** An AI system that has not been reviewed by the ARB, provisioned, and approved by Aramark.

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j) **Human-in-the-Loop:** A design requirement ensuring human accountability for AI system effects, including the review and approval of AI outputs or actions.

k) **Autonomous/Agentic AI:** Autonomous systems powered by Large Language Models (LLMs) that can reason, plan, use tools, maintain memory, and take actions to accomplish goals.

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:

- Taking personal responsibility for doing the right thing
- Honesty and fair dealing
- 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:

1. Human Judgment and Accountability
    - AI is not a substitute for human judgment and decision making.
    - You are responsible for your work derived from the direct or indirect use of an AI tool.
    - You must apply your judgment to employment and personnel decisions.
2. Data Privacy and Sensitive Information
    - Only use Aramark-Approved AI Systems.
    - 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 log-in credentials to register for any Public AI System or Unapproved AI System.
    - NEVER enter or connect any Sensitive Information into a Public AI system or Unapproved AI System.
3. Likeness and Copyright
    - Consider copyright restrictions when using AI.
    - AI must never be used to impersonate or clone the likeness (visual or voice) or online presence of any person in connection with your work at Aramark
4. Agents and Human-in-the-Loop
    - You are accountable for the actions and outputs of any AI agent that acts on your behalf or within a process you own or have built. You must use judgment to decide when human review, approval, or authorization is needed before the agent proceeds.
    - NEVER install or utilize an unapproved personal AI agent or assistant on an Aramark device or asset.
5. Follow the Process

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- Follow the AI Approval Process published on the Artificial Intelligence page of MyAramark before using, building, procuring, or deploying an AI use case or AI system for Aramark business.
- AI coding tools must comply with Aramark's Secure Software Development Lifecycle Policy
- Accessing or provisioning AI systems on Aramark devices must comply with Aramark's Global Acceptable Use Policy.

6. Pause and Ask for Help
   - If you are not sure whether an AI use is permitted, stop before proceeding and submit a question to the AI Inquiry Mailbox.
   - Consult the Artificial Intelligence page on MyAramark for guidance.

Any exception to this Policy must be requested in writing to the AI Security and Governance Team and approved by the AI Risk Governance Committee before the exception is used.

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.

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Interdependent policies & trainings	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 Policy; Loss, Disclosure or Unauthorized Access of Personal Information; Social Networking Policy
Revision History	July 11, 2023– v1.0 September 05, 2024 – v2.0 August 14, 2026 – v3.0