



Date: November 2025
Business unit: Technology Innovation

Responsible AI Usage Policy

1. Purpose

At Contact, we're committed to using artificial intelligence (AI) in ways that are safe, ethical, and aligned with our values. This policy sets out what responsible AI looks like, from how we build and deploy it, to how we use it day to day. It's here to help us make fair, transparent and trustworthy decisions that support our people, customers, and communities.

2. Application

This policy applies to all directors and employees of Contact and its subsidiaries, including secondees, contractors, and consultants.

It also applies to third-party vendors and partners who build, deploy, use, or interact with AI systems, platforms, or tools on behalf of Contact.

It covers all AI solutions used across the organisation, whether developed in-house or sourced externally.

2.1 Policy Acceptance

Everyone covered by this policy **must follow** this policy before building, deploying, or using AI solutions. This ensures we're all on the same page when it comes to responsible AI use.

2.2 Definition of AI

Artificial Intelligence (AI) refers to systems designed to perform tasks that typically require human intelligence, such as learning, reasoning, problem-solving, perception, and language understanding. These systems use data-driven algorithms and models to make predictions, generate insights, or take actions, and may improve their performance over time through adaptive learning.

Artificial Intelligence (AI) is an umbrella term that encompasses a wide range of technologies and capabilities designed to perform tasks that typically require human intelligence. The following table provides definitions and examples of several key areas within AI, helping to clarify the breadth and depth of what AI can achieve in practical settings.

Type	Description	Examples / Use Cases
Machine Learning (ML)	A subset of AI that enables systems to learn patterns from data and improve performance without explicit programming. Most ML algorithms follow deterministic mathematical procedures given the same data and parameters, they produce the same model and predictions. However, the learning process itself is adaptive: the system adjusts its internal parameters based on observed data rather than fixed rules.	Learns from historical data to improve predictions or recommendations as new data arrives. Used in predictive analytics, anomaly detection, and recommendation systems.
Generative AI	Generative AI is a branch of Artificial Intelligence focused on creating new, original content such as text, images, audio, or video based on patterns learned from existing data. It is non-deterministic, meaning outputs can vary even with the same prompt because models use probabilistic sampling. Generative AI is trained on large data sets and generative AI models synthesize entirely new outputs that resemble the training data but are not exact copies.	Generative AI creates entirely new content such as articles, images, designs, or music rather than duplicating existing data.
Large Language Models (LLMs)	A Large Language Model (LLM) is an advanced AI system designed to understand and generate human language. It is trained on massive text datasets using deep learning to learn patterns such as grammar, meaning, and context. This enables LLMs to produce coherent, contextually relevant language outputs without explicit programming.	LLMs power tools that write reports, summarise documents, answer questions, generate code, and support chatbots. Some also handle images and audio.
Small Language Models (SLMs)	Lightweight versions of language models, optimized for efficiency and resource-constrained environments such as mobile devices or edge computing.	Ideal for tasks requiring heightened privacy or tailored to specific domains, as well as deployment on mobile devices or at the network edge where resources are limited.
Chatbots	Chatbots are AI-powered systems that simulate human conversation, either through text or voice interactions. They use natural language processing (NLP) to understand user queries and respond appropriately. Chatbots may be rule-based, using predefined scripts, or use machine learning and language models to engage in more dynamic, context-aware dialogue. Advanced chatbots continuously learn from interactions to improve their responses over time.	Some examples include handling customer service requests automatically, delivering technical support, helping users navigate procedures, assisting with reservations, and supplying information via websites, messaging platforms, or voice-activated assistants.
Agentic AI	Agentic AI refers to artificial intelligence systems that can operate independently to achieve a goal. These systems don't just respond to prompts they can plan tasks, make decisions, and take actions without constant human input. Agentic AI can adapt based on feedback or changing conditions.	Agentic AI is used in scenarios where tasks need to be completed end-to-end without constant human input. For example, it can autonomously research and compile information, generate and format reports, or manage workflows by retrieving data, analysing it, and sending updates.

3. Responsible AI Use at Contact

Responsible AI at Contact means designing, developing, and using AI in ways that are safe, ethical, and transparent, and aligned with our values, legal obligations, and strategic priorities.

It's about making sure AI supports our people, customers, and communities without compromising privacy, fairness, or trust.

4. Using AI at Contact

All AI solutions at Contact must follow our standards, guidelines, and Our Principles for Responsible AI Use.

This policy provides a framework for:

- Promoting fairness and accountability in AI-enabled decision-making
- Maintaining human oversight
- Assessing and managing risks
- Protecting privacy and confidentiality

5. Our Principles for Responsible AI Use

These principles guide how we use AI at Contact and are grounded in lawful, ethical practices that align with our strategic objectives. They help us make good decisions, manage risks, and stay true to our values. Our principles are aligned with the [OECD AI Principles](#).

Act in alignment with Contact's values and goals, including compliance

We comply with all relevant legislation (see Appendix, 10.2), and ensure our actions don't harm our business, reputation, customers, or employees.

Ensure privacy and confidentiality

AI use must never compromise confidential customer, employee, or business information. All AI use must comply with Contact's Confidentiality and Privacy Policy.

Human oversight and accountability

AI is a tool that can assist in business processes. Human oversight is required when AI interactions involve personal information, raise ethical considerations, or present safety risks, and is strongly recommended when they involve significant business impact in order to uphold trust and fairness, reduce automation bias, and maintain accountability.

Ethical behaviour, fairness and non-discrimination

We ensure our AI systems are designed and used in a way that avoids bias and discrimination, and supports fairness in every customer and employee interaction.

Governance, risk management guardrails and external engagement

We use Contact's guardrails and security controls to manage AI risks and protect our business. When modifying existing solutions or exploring new AI solutions, we follow Contact's governance and risk processes, including doing our due diligence when working with external organisations.

Transparency and explainability

AI systems must be explainable or interpretable. People should understand how decisions are made and be able to communicate that clearly.

Security by design

AI systems must be secure by design, with strong protections against misuse or breaches.

Clear ownership and accountability

There must be clear business and technical ownership of AI systems and their outcomes, and accountability for compliance and ethical use.

Respect intellectual property

We distinguish between AI solutions involving Contact's commercially sensitive IP, which must be licensable or owned by Contact, and more general technologies, where partnering with third parties may be appropriate.

6. AI Guardrails at Contact

At Contact, we've put strong guardrails in place to guide the responsible use of artificial intelligence. These guardrails help us manage AI risk, ensure compliance, and stay aligned with our values and strategic goals.

6.1 Our Guardrails include:

- **Information, AI and Data Governance Committee**
This committee oversees AI use across Contact to ensure it aligns with our Responsible AI Use Policy and broader governance frameworks.
- **Board AI risk appetite statement**
AI will be built, delivered, and used in a manner which aligns with Board Risk Appetite statements. Risk assessment processes support this outcome across all technology and business domains.
- **AI assessment**
All new AI tools, as well as any integration of AI into existing tools, must undergo an AI Assessment to evaluate the risk, impact, and appropriateness of AI systems before they're deployed. This structured evaluation reviews each solution for security risks, protection of our intellectual property, compliance with governance standards, and alignment with our ethical and business objectives. By conducting this assessment, we ensure that every AI initiative safeguards sensitive information, upholds our values, and minimises potential risks before deployment.
- **AI deployment patterns**
Repeatable patterns that outline the controls required for different types of AI implementations. These ensure each deployment reflects the business context, risk profile, and intended outcomes.
- **Information security controls**
AI solutions must include appropriate security assessment from ideation to deployment, with risk review confirming adequate controls are in place prior to implementation. These should include measures such as Data Loss Prevention (DLP) monitoring and access controls to protect sensitive data.
- **Legal review**
Some AI use cases will require a legal review before engaging with a third party to procure a new AI tool. Legal will consider relevant legislative regimes (see 10.2), and review the relevant contractual documentation, including the Terms of Use and/or EULA(s) in line with Contact's obligations and risk appetite.
- **Procurement process**
All AI-related purchases must follow Contact's procurement process. This ensures compliance with our standards and proper evaluation of vendors and tools.

6.2 Supporting activities and processes

To help everyone at Contact use AI safely and confidently, we've also put the following support in place:

- **AI education**
Ongoing opportunities to build AI literacy through Contact University, including the Data and AI Academy. This helps employees understand responsible AI practices and their role in compliance.
- **“Show Me – AI” community channel**
A space in our Data Community where employees can ask questions, seek guidance, and connect with others working with AI across Contact.
- **Approved platforms and tools**
AI solutions involving sensitive Contact IP or information, or any tool that may be used in the Retail, Generation & Trading or HR space, must use one of our approved platforms or tools.

7. Broader considerations

7.1 Protecting Contact IP and respecting third-party IP

Only use approved platforms for any AI activity involving Contact information or IP. Do not paste Commercially Sensitive, Confidential or personal information into unapproved AI tools. Follow the Information Classification Standard and Acceptable Use Policy at all times.

Before using any external AI service or dataset, confirm training and usage rights, output ownership, and licence obligations via the Contracts Governance and TAM process. Keep contracts/EULAs and entitlement records up to date in the system of record.

When using open-source components or models, ensure licence obligations (including attribution and share-alike terms) are met and documented.

Staff must not disclose Contact trade secrets or customer data in prompts, examples, or fine-tuning datasets in unapproved AI tools.

7.2 Human oversight and automation bias

Automation bias is over-reliance on AI outputs. For AI-assisted decisions that may significantly affect customers, people, communities, our assets or our people, Contact requires human-in-the-loop (HITL) controls to ensure:

- Humans can understand capabilities and limitations, detect anomalies, and override outputs.
- Dual verification could be used for high-risk activities or sensitive inferences (e.g., customer impacting, safety incidents).

7.3 AI use for meeting recordings and transcriptions

When using AI tools to record or transcribe meetings, employees must ensure participants are informed and consent is obtained where required.

Meeting recordings and transcriptions must only be conducted through approved Contact tools e.g. Microsoft Teams.

Transcriptions must be stored securely in one of the Contact approved tools and treated as confidential information in line with Contact’s Privacy Policy and records and Contact’s requirements for data retention.

7.4 AI Lifecycle Management

Effective management, testing, monitoring, and drift management are required for AI tools. Prior to deployment, all custom AI models must undergo comprehensive testing for accuracy, robustness, and fairness, with results subject to review. Once in production, models are to be continuously monitored for performance and potential drift whether data or concept-related using approved tools and reporting mechanisms. Alerts should prompt immediate triage and, as necessary, model rollback or retraining. Details of each AI model must be documented in the AI model register, and, for models utilizing generative AI, the specific LLM version must be recorded in the register. For more details see the AI Lifecycle Management Standard.

8. Related Documents

List of related documents

8.1 Policies

- Information Security Policy
- Confidentiality and Privacy Policy
- Data and Information Management Policy
- Technology Acceptable Use Policy

8.2 Standards

- AI Lifecycle Management Standard
- Information and Data Capture Standard
- Information and Data Disposal Standard
- Information and Data Sharing Standard
- Contact’s Requirements for data retention Standard
- Data Retention and Destruction for Personal Information Standard
- Data Retention and Destruction for Corporate Information Standard

9. Document control

Version	1
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10. Appendices

10.1 Glossary

The following terms that are used in the policy have a specific meaning:

Term	Definition
Agentic AI	AI systems that can act independently toward goals, potentially making decisions or taking actions without direct human instruction.
Artificial Intelligence (AI)	The use of computer systems to mimic human intelligence such as learning, reasoning, problem-solving and decision-making, based on data and programmed logic.
Automation Bias	The tendency for people to favour decisions or suggestions made by automated systems, even when those systems may be incorrect.
Bias (in AI)	Systematic errors in AI outputs caused by flawed data, design or assumptions, which can lead to unfair or discriminatory outcomes.
Context Binding	The process by which an AI system maintains awareness of relevant information across interactions, allowing it to respond appropriately based on prior inputs, user roles, or situational context.
EULA	End User License Agreement
Explainability	The extent to which the workings and decisions of an AI system can be understood and interpreted by humans.
Generative AI	A class of AI that creates new content such as text, images, audio or code, based on patterns learned from training data. Examples include chatbots, image generators and code assistants. Contact has made available a number of approved generative AI tools for example tools such as Microsoft co-pilot these are approved tools that can be used inside the organisation and provide secure access to products such as ChatGPT. Staff should only use endorsed AI tools where they are sharing Contact information.
Human-in-the-loop	Where human oversight is maintained in AI decision-making processes, especially for critical or high-risk tasks.
Large Language Model (LLM)	A type of AI model trained on extensive text data to understand and generate human-like language. These models can answer questions, summarise content and assist with writing.
Machine Learning (ML)	A branch of AI that enables systems to learn from data and improve performance over time without being explicitly programmed for each task.
Model Drift	A decline in the accuracy or reliability of an AI model over time due to changes in the underlying data or environment.
Neural Network	A computational structure inspired by the human brain, used in machine learning to detect patterns and relationships in data.
Responsible AI	The practice of designing, developing and using AI in ways that are ethical, transparent and aligned with legal and organisational values.
Small Language Model (SLM)	A more compact version of a language model, designed to operate efficiently with fewer resources while still providing useful language-based capabilities. Often used in edge devices or privacy-sensitive environments.

10.2 Relevant Legislation for AI use in New Zealand

[MBIE's Responsible AI Guidance for Businesses \(2025\)](#) highlights several key legislative areas that intersect with AI use which have been provided here for context as the minimum legislation that all companies in New Zealand using AI should be aware of and adhere to:

1. Commerce Act 1986

- **Relevance:** AI systems must not engage in anti-competitive behaviour or mislead consumers.
- **Examples:** Algorithmic pricing collusion, false reviews, or deceptive advertising practices.

2. Privacy Act 2020

- **Relevance:** AI systems must handle personal data in accordance with New Zealand's privacy principles.
- **Examples:** Ensuring lawful data collection, informed consent, data minimisation, and secure storage.

3. Human Rights Act 1993

- **Relevance:** AI must not discriminate or infringe on individual rights.
- **Examples:** Avoiding bias in recruitment algorithms or service delivery tools.

4. Consumer Law: Fair Trading Act 1986 and Consumer Guarantees Act 1993

- **Relevance:** AI-generated content or decisions must not mislead or deceive.
- **Examples:** Automated customer service or product recommendations must be accurate and fair.

5. Copyright Act 1994

- **Relevance:** AI systems must respect intellectual property rights, especially when training on third-party content.
- **Examples:** Using copyrighted datasets or generating derivative works.

6. Employment Relations Act 2000

- **Relevance:** AI tools used in HR or performance management must comply with employment law.
- **Examples:** Transparency in automated decision-making affecting staff.

7. Health and Safety at Work Act 2015

- **Relevance:** AI systems used in operational environments must not introduce safety risks.
- **Examples:** Autonomous systems in energy generation or field operations.

8. Companies Act 1993

- **Relevance:** Directors need to be across these to make sure that they are exercising due care and upholding their legal and ethical obligations.
- **Examples:** Duty of care.

9. Māori Data considerations.