

Artificial Intelligence (AI) Policy Statement

This policy guides the responsible, secure and ethical use of Artificial Intelligence (AI), including generative AI, within Troup Bywaters + Anders LLP (TB+A). It supports our defining pillars and core values of Partnership, Integrity and Responsibility, and should be read alongside our Integrated Management System procedures, information security requirements, data protection policies, IT guidance notes and any project-specific client obligations.

This policy applies to all TB+A employees, sub-consultants and suppliers who use, procure, develop, configure or rely on AI tools or AI-generated outputs in connection with TB+A business.

Appropriate action will be taken in the event of a violation of this policy.

Definitions

For the purposes of this policy, **AI** means software or systems that can perform tasks normally requiring human intelligence, such as generating, summarising, analysing, classifying or predicting information. **Generative AI** means AI capable of creating new text, images, code, audio, video or other content. **Approved AI tools** are tools reviewed and authorised by TB+A in accordance with this policy. **Confidential information** includes client, project, commercial, technical, personal, proprietary or business-sensitive information that is not public.

Responsible and Ethical Use

TB+A recognises that AI can support creativity, productivity, quality and operational efficiency when used responsibly. AI must be used in a way that is lawful, ethical, transparent, secure and consistent with our professional duties, client commitments and values. AI must not be used in a way that misleads others, undermines human accountability, creates unfair or discriminatory outcomes, compromises confidentiality, or exposes TB+A, our clients, our people or communities to unacceptable risk.

Permitted and Prohibited Use

Approved AI tools may be used to support appropriate business activities such as brainstorming, drafting non-confidential text, summarising public information, improving clarity of writing, creating internal learning materials, assisting with administration and exploring productivity improvements. All outputs remain subject to human review and professional judgement.

AI tools must not be used to process or upload personal data, client confidential information, unpublished project documents, fee proposals, contracts, commercially sensitive information, proprietary calculations, design information, technical models, source files, credentials or TB+A intellectual property unless the tool has been approved for that specific purpose and the relevant information security, legal, contractual and client requirements have been satisfied.

Data Security, Privacy and Confidentiality

A "proceed with caution" approach must be adopted at all times. AI use must comply with applicable data protection legislation, client confidentiality obligations, non-disclosure agreements, appointment terms, framework agreements, project-specific information security requirements and TB+A policies. Users must not input confidential, personal, sensitive or proprietary information into unapproved AI tools. Where approved tools are used, users must follow the relevant guidance on data retention, storage location, access controls and whether prompts or outputs may be used for model training.

Quality Control and Due Diligence

AI is not a replacement for human judgement, professional expertise or accountability. AI-generated outputs must be reviewed, validated and, where necessary, amended by an appropriately competent person before they are relied upon, shared or issued. Technical advice, calculations, design assumptions, specifications, reports, recommendations and client-facing deliverables must be independently checked in accordance with TB+A procedures and applicable professional standards.

Users must verify AI-generated content against reliable and authoritative sources, including relevant project documents, standards, regulations, guidance, client requirements and professional review. Particular care must be taken to identify inaccuracies, omissions, hallucinations, bias, outdated information, inappropriate assumptions and copyright or intellectual property risks.

Approved Tools and Implementation

Only AI tools approved by TB+A may be used for business purposes. Approval must include review by the Innovation working group and, where required, Partner approval through the software licence review process. Personal accounts, free/public tools or unapproved services must not be used for TB+A business information or client work. Approved use will normally be limited to enterprise-level solutions with appropriate contractual, security, privacy and governance controls.

Transparency, Records and Disclosure

Where AI materially contributes to a business decision, technical output or client-facing deliverable, an appropriate record should be kept of the tool used, the purpose of use, key inputs where appropriate, the basis of verification and the human review undertaken. AI use should be disclosed to clients or third parties where required by contract, law, professional obligation, project protocol or where transparency is otherwise necessary to avoid misleading recipients.

Suppliers and Sub-consultants

Suppliers and sub-consultants using AI in connection with TB+A work must comply with this policy, relevant contractual requirements and TB+A's ethical and operational standards. They must use AI responsibly, protect confidential and personal information, maintain appropriate human oversight, manage risks, and provide evidence of AI governance, data management and control measures where reasonably requested. TB+A reserves the right to audit or request assurance regarding supplier and sub-consultant AI practices.

Training, Awareness and Culture

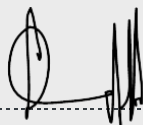
TB+A will provide training, guidance and practical resources to help our people use AI safely, responsibly and effectively. Mandatory annual training will be provided, supplemented by ongoing guidance and continuing professional development where appropriate. This supports a culture of innovation and collaboration while maintaining professional standards, ethical behaviour and accountability.

Monitoring, Reporting and Breaches

AI systems and tools may be monitored or audited under the instruction of the Head of IT to confirm compliance with this policy, legal obligations, client requirements and internal procedures. Any suspected misuse, data breach, confidentiality incident, security concern or uncertainty about AI use must be reported promptly through TB+A's reporting process or to the Head of IT and Innovation working group. Breaches of this policy may result in appropriate corrective action, including disciplinary, contractual or supplier management action where applicable.

Review and Governance

The AI and Innovation working group will support the Head of IT in reviewing this policy and related procedures to reflect technological developments, regulatory change, client expectations, lessons learned and recognised good practice. Feedback from stakeholders will be considered as part of continuous improvement. Policy changes will be approved in accordance with TB+A's governance arrangements.

Signed:  James Campbell – Managing Partner

Date: 5th August 2026 P

Next review date Jan 2027