Responsible AI Use Policy

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This policy was last updated on 16th July 2026.

Our commitment to ethical working practices

ADELPHI is committed to developing, deploying, and using Artificial Intelligence ("AI") responsibly, ethically, and in a way that earns and maintains trust. Where we utilise AI systems, we seek to ensure they are designed and used in a manner that respects human rights, human dignity, and fundamental rights, and supports transparency, fairness, accountability, and appropriate human oversight.

This Responsible AI Use Policy explains the principles and safeguards we apply when using AI technologies in the course of our business activities.

Adelphi Group of Companies – who are we?

This Policy applies to the Adelphi Group of Companies. Adelphi Group is part of Omnicom Health Group; a division of Omnicom Group Inc. Find out more about the Adelphi Group of Companies

In this policy **ADELPHI**, **we**, and **us** means the Adelphi Group of Companies.

About this Policy

This Responsible AI Use Policy sets out the principles and safeguards that guide our use of AI technologies in the course of our business activities. It is intended to promote responsible innovation while helping to ensure compliance with applicable laws, regulations, and recognised standards relating to AI and the protection of fundamental rights.

This policy applies to the use of AI systems developed by us or provided by third parties, AI tools used to support business operations, products, or services and all employees, contractors, and authorised representatives acting on **ADELPHI's** behalf.

What we mean by 'AI.'

For the purposes of this policy, Artificial Intelligence ("AI") refers to systems or tools that use techniques such as automated analysis, machine learning, natural language processing, or automated or semi-automated decision logic to generate outputs, predictions, recommendations, or content that may influence processes or outcomes.

AI Principles

Lawful and Ethical Use

ADELPHI uses AI in compliance with applicable laws, regulations, and recognised industry standards. We apply appropriate legal, technical, and organisational safeguards in line with applicable legal and regulatory requirements to support the safe, reliable, and appropriate use of AI, and we aim to provide meaningful information about the role of AI in generating outputs or supporting decisions.

AI will not be used for unlawful, deceptive, or unethical purposes. Where required, we clearly inform individuals when they are interacting with an AI system or when content has been generated by AI.

We design our AI governance framework to adapt to evolving legal and regulatory requirements across the jurisdictions in which we operate.

Human Oversight and Accountability

We maintain appropriate oversight of AI systems in use, assign clear accountability for their deployment and outcomes, and monitor AI systems for adverse impacts. Where issues or unintended outcomes are identified, we take proportionate corrective action.

Our use of AI is intended to support human decision-making and does not replace human accountability. Appropriate human oversight is embedded within our AI governance framework and implemented through our processes. AI-generated outputs are subject to human review, and clear ownership is assigned for AI-enabled systems and outcomes.

Fairness and non-discrimination

We take reasonable steps to identify, assess, and reduce the risk of bias in AI systems, and to avoid unfair or discriminatory outcomes. Where there is a risk of unequal impact on individuals or groups, we apply appropriate controls and regularly review AI outputs. Consideration of fairness and non-discrimination is embedded within our AI risk assessment processes, and informs decisions about the design, deployment, and use of AI systems.

Transparency and Explainability

We aim to be transparent about when AI is used in our products, services, or internal processes, and about the role AI plays in generating outputs or recommendations. Where required by law, regulation, contract, or internal policy, we inform users and clients when AI is used to generate or support outputs, and we ensure AI-generated content is clearly identified, particularly in research, publications, and deliverables. Where appropriate, we provide meaningful explanations of AI-supported decisions, particularly where individuals may be affected. AI-generated outputs must be reviewed and validated by an appropriately qualified individual before being relied upon or shared externally.

Risk Assessment

We assess AI systems using a risk-based approach that takes into account the nature, context, and potential impact of the AI use, including the type of data processed. Where AI use may pose higher risks to individuals or fundamental rights, we apply additional controls and carry out appropriate assessments, with proportionate safeguards implemented before and during deployment.

Where AI systems involve the processing of personal data, we ensure such use is supported by an appropriate lawful basis and complies with applicable data protection laws and principles, including data minimisation and purpose

limitation. Where required, the use of personal data in AI systems is subject to a data protection impact assessment or other appropriate risk assessment.

We do not use confidential or personal data to train public or unauthorised AI tools or models.

Security and Reliability

We apply appropriate technical and organisational safeguards to support the security and reliability of AI systems. These safeguards are intended to ensure that AI systems are secure against unauthorised access or misuse, tested for reliability and performance, and monitored for errors, misuse, or unintended outcomes. Where risks are identified, we take proportionate steps to address them in line with our governance and risk management processes.

Responsible Use of Third-Party AI

Where we rely on third-party AI technologies or services, we conduct appropriate due diligence and consider relevant security, privacy, and ethical risks. We use such tools in accordance with applicable contractual and legal obligations and work with suppliers that implement safeguards intended to protect individuals' rights and comply with applicable legal and regulatory requirements.

We apply ongoing oversight of third-party AI use, which is embedded within our supplier management and governance framework.

Prohibited and Restricted Uses

We do not knowingly use AI to make solely automated decisions with legal or similarly significant effects on individuals, engage in unlawful surveillance, profiling, or monitoring, generate misleading, deceptive, or harmful content, or circumvent applicable legal, regulatory, or contractual obligations. AI must not be used in a manner that breaches client instructions, contractual commitments, confidentiality obligations, or applicable research industry codes.

Our AI use cases and governance arrangements are subject to ongoing oversight and review to help ensure continued alignment with this policy and applicable legal and regulatory requirements.

Training and Awareness

We support responsible AI use by providing appropriate guidance and training to employees on acceptable and responsible use of AI technologies, encouraging the critical evaluation of AI-generated outputs, and promoting awareness of AI risks, limitations, and ethical considerations.

Training and guidance are provided in a manner that is proportionate to an individual's role and level of involvement with AI use, and are designed to support responsible, lawful, and effective use of AI systems. Where appropriate, AI tool-specific training or guidance is implemented to reflect the nature and risks of particular AI applications.

Monitoring and Review

Our use of AI systems is subject to ongoing oversight and review through appropriate governance forums, which support accountability and help ensure continued alignment with this policy and applicable legal and regulatory requirements. We periodically review this policy and our associated governance processes, and update our approach as AI technologies, standards, and regulatory requirements continue to evolve.

Contact details

If you have any questions about this policy, our approach to responsible AI use, or wish to raise a concern about the use of AI in connection with our activities, please contact the Adelphi Compliance Team at compliance.team@adelphigroup.com.

Where your query relates to the use of personal data, data protection rights, or a request for human review of an AI-supported decision involving personal data, you can also contact the Adelphi Data Protection Officer at DPO@adelphigroup.com.

Changes to this Policy

We keep this Responsible AI Use Policy under regular review and reserve the right to revise it at any time. There is a date at the beginning of this policy which indicates the date it was updated.