



Panoram AI Policy

1. Purpose

The purpose of this AI Policy is to establish guidelines for the ethical and responsible development, deployment, and use of Artificial Intelligence (AI) technologies within Panoram, particularly for enhancing legal processes around e-discovery and contract management. This policy aims to ensure the confidentiality, integrity and accessibility of client data and compliance with relevant regulations across the UK, EU, and USA, as well as applicable certification standards.

2. Scope

This policy applies to all Panoram employees, workers, contractors, consultants and relevant third parties. It applies to all AI systems that Panoram develops, configures, procures, integrates, provides, manages or uses, including PanoramAI, AI capabilities embedded within other products, and third-party AI services used for client delivery or internal operations.

The policy applies throughout the AI system lifecycle, including concept and requirements definition, procurement or design, development and configuration, testing and validation, deployment and use, monitoring and change, and retirement or disposal. Client data, personal data or Panoram confidential information must not be entered into an AI system unless the system and the specific use have been authorised and all applicable contractual, security, data-protection and retention controls are in place.

3. Commitments

Panoram is committed to establishing, implementing, maintaining and continually improving an AIMS aligned with ISO/IEC 42001:2023 and proportionate to the context, intended use and risk of its AI activities.

Panoram will:

- develop, provide, procure and use AI responsibly and in a manner consistent with Panoram's values, strategic direction and risk appetite;
- establish, monitor and review measurable AI objectives at relevant functions and levels;
- identify and meet applicable legal, regulatory, contractual, professional, ethical and certification requirements, together with relevant requirements of interested parties;
- identify, assess, treat and monitor AI-related risks and impacts throughout the AI system lifecycle, including impacts on individuals, groups, organisations, society and the environment;
- provide clear accountability, competent personnel, appropriate resources and proportionate human oversight for AI systems;
- protect personal data, client confidential information, intellectual property and the security of AI systems and supporting resources;
- communicate this policy and relevant responsibilities within Panoram and make the policy available to interested parties where appropriate;
- monitor AIMS performance, address incidents and nonconformities, take corrective action;
- continually improve the suitability, adequacy and effectiveness of the AIMS.
- Panoram is committed to meeting the following AI principles:
 - a. Fairness, Non-discrimination and Accountability
 - b. Privacy, Confidentiality and Data Governance
 - c. Human Oversight
 - d. Transparency and Explainability
 - e. Safety, Security, Reliability and Robustness
 - f. Societal and Environmental Wellbeing
 - g. Risk-based Lifecycle Management

4. Compliance and Enforcement

Compliance with this policy will be monitored through risk and impact assessments, system and supplier reviews, operational monitoring, audits, management reviews, incident management and other assurance activities. Actual or suspected breaches shall be reported promptly and managed through Panoram's incident, nonconformity and corrective-action processes.

Non-compliance may result in restriction or withdrawal of access, remediation, disciplinary action or contractual action, as appropriate and in accordance with applicable procedures.

5. Review and Update

This policy shall be reviewed at least annually and following any material change in Panoram's strategy, AI activities, applicable requirements, technology or risk environment, or following a significant incident, nonconformity, audit finding or management-review decision. The AI Governance Board will coordinate the review and submit material changes for Management approval.

Approved changes shall be documented, communicated to relevant personnel and made available to interested parties where appropriate. Superseded versions shall be retained or disposed of in accordance with Panoram's document-control and records-management requirements.

Signed by:

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Greg Wildisen
Chairman

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