Artificial Intelligence (AI) Usage Policy

1. PURPOSE

The purpose of this policy is to ensure the ethical, responsible, and secure use of artificial intelligence tools ("AI") within Packaging Corporation of America ("PCA"). This policy details the requirements all PCA employees, contractors and third party vendors must follow in connection with their work or services for PCA.

2. SCOPE

This policy applies to all employees, contractors, and third party vendors who use AI tools in their work or services for PCA.

3. DEFINITIONS

3.1. ARTIFICIAL INTELLIGENCE (AI)

Content generating tools that enable computers or machines to perform tasks that typically require human intelligence. There are three categories of AI pertaining to PCA.

3.1.1 Category I – On Premises AI: This is AI being developed internally at PCA by PCA's IT department. Only individuals authorized by PCA's IT department will use or interact with On Premises AI.

3.1.2 Category II – Tenant Based AI: This is AI embedded within software applications and programs utilized by PCA on PCA systems (e.g. Microsoft Office Products).

3.1.3. Category III – Third Party AI: This is AI which is developed, managed, and stored by third parties (e.g. ChatGPT, Grok, etc).

3.2. SENSITIVE DATA

Information that must be protected from unauthorized access, to safeguard the privacy or security of PCA and its employees, customers, contractors, partners, and third party vendors. Sensitive Data includes, but is not limited to, passwords and other credentials, business and marketing plans, customer or vendor related information, product pricing information, the identity of actual or potential customers or vendors, personal

information (as defined below), trade secrets, product innovations and designs, patents, trademarks and copyrights or any other non-public PCA related information.

3.3. PERSONAL INFORMATION

Name, personal or protected characteristics, email address, browsing history, location data, employment data, IP address, social security or passport number, driver's license or state ID, financial account data, or health information of any individual.

4. POLICY

PCA is committed to using AI in a manner that is ethical, transparent, and compliant with all applicable laws and regulations. All individuals subject to the Policy must comply with the following guidelines:

4.1. RESPONSIBLE AI USE

- Understand that AI may be useful but is not a substitute for human judgment or decision making.

- Recognize the limitations of AI and always use good judgment when interpreting and acting on AI-generated information or recommendations.

- Must use AI responsibly and ethically, avoiding any actions that could harm others, violate privacy or the confidentiality obligations of PCA, or facilitate malicious activities.

- **Will not upload or input any Sensitive Data, Personal Information, or other confidential or proprietary, information into any Third Party AI.**

- Must not use AI to discriminate against any individual based on their protected characteristics, such as race, gender, age, or disability.

- Must not utilize AI in any manner that infringes on the intellectual property rights of others.

- Verify that any response from AI that you intend to rely on, or use, is accurate and appropriate.

- Must not use AI in any manner that is inconsistent with the requirements of PCA's Code of Ethics and Business Conduct.

4.2. COMPLIANCE WITH LAWS AND REGULATIONS

AI must be used in compliance with all applicable laws and regulations, including data protection, privacy, and intellectual property laws.

4.3 TRANSPARENCY AND ACCOUNTABILITY

- Must be transparent about the use of AI in their work, ensuring that stakeholders are aware of the artificial technology's involvement in decision-making processes.

- Individuals subject to this Policy are responsible for the outcomes generated by AI and should be prepared to explain and justify those outcomes.

4.4. DATA PRIVACY AND SECURITY

Individuals subject to this Policy must adhere to PCA's data privacy and security policies when using AI. Most Third Party AI systems retain the information and prompts given to the AI and use such information to further train the AI engine. As such, individuals subject to this Policy must ensure that no Sensitive Data is provided or uploaded into Third Party AI.

4.5. BIAS AND FAIRNESS

Individuals subject to this Policy must actively work to identify and mitigate biases in AI systems. One should ensure that these systems are fair, inclusive, and do not discriminate against any individuals or groups.

4.6. PERSONAL DEVICES

When utilizing AI on personal devices for PCA work or services, all individuals must only use PCA Corporate IT approved AI services or platforms.

5. RESPONSIBILITIES

5.1. INDIVIDUALS SUBJECT TO THIS POLICY

Adhere to this policy and report any suspected violations, breaches, or any potential ethical, legal, or regulatory concerns related to AI use to PCA IT.

5.2. IT DEPARTMENT

Maintain and secure On Premise AI and monitor use, performance, compliance, applicability, and suitability of Tenant Based AI. Review and update this Policy as needed to reflect changes in technology and applicable law.

6. ENFORCEMENT

Violations of this policy may result in disciplinary action, up to and including termination of employment, or in the case of third party contractors or vendors, termination of business relationship with PCA, in accordance with Packaging Corporation of America's policies and procedures.

Effective Date: 10/23/2024