

Policy Introduction

Crown Castle recognizes that the use of generative artificial intelligence tools and machine learning tools (“AI Tools”) can increase teammate productivity and foster innovation, and Crown Castle supports the use of AI Tools in a safe, ethical, and secure manner. At the same time, the use of AI Tools can potentially pose risks to our business

The purpose of this Artificial Intelligence Governance Policy is to provide teammates with guidelines for the responsible use of AI Tools while protecting Crown Castle and mitigating the risk of misuse, unethical outcomes, potential biases, inaccuracy, and information security breaches.

All teammates are responsible for using AI Tools in a productive, ethical, and lawful manner.¹

Scope

This Policy applies to all teammates in the course of their employment when using AI Tools for authorized business purposes, including in their dealings with third-party agents and vendors, and when using a teammate’s personal device for authorized business purposes.

For the purposes of this Policy, AI Tools are tools like ChatGPT, Microsoft Copilot, GitHub Copilot, Bing AI, Google Gemini (formerly Google Bard) or other similar applications. This list is not intended to be exhaustive but is provided as examples of AI Tools that teammates may have access to or utilize in the course of performing their work.

A list of permitted AI Tools can be found on the [AI Tool Showcase SharePoint site](#). This list is maintained and updated by Data Risk Management. Teammates with questions regarding any AI Tool included on the list will find contact information on the site.

If a teammate wishes to use an AI Tool that is not on the AI Tool Showcase, they must submit a request via the [Service Desk Portal](#) or directly through the [‘Other Software’ request form](#).

Compliance with Related Policies and Agreements

This Policy is intended to add to, not contradict, limit, or replace, applicable rules, policies, legal requirements, legal prohibitions, and contractual obligations, all of which remain in full force and effect. Any use of AI Tools under this Policy must comply with the relevant policies, internal controls, and guidelines of Crown Castle, including the following:

- Proper Business Practices and Ethics Policy
- Anti-Harassment Policy and all related state specific policies
- Information Security Policy
- Authorized Use Policy
- Document Retention and Destruction Policy
- Enterprise Security Policies, Standards & Procedures
- Internal and external privacy notices

¹ Recently, there has been an emerging proliferation of legislation and regulation governing AI and its use, particularly at the state and local level. Experts expect this trend to continue and we are tracking pending and proposed legislation and rulemaking accordingly in order to ensure Crown Castle’s ongoing compliance with the developing regulatory landscape.

Guidelines for Using AI Tools

When using AI Tools in the workplace, teammates must adhere with the following requirements:

- Confidential information, proprietary information, trade secrets, intellectual property, and personal identifiable information, collectively referred to as 'Sensitive Information', may only be shared with approved AI Tools systems and in compliance with all applicable company policies and procedures including, but not limited to, Enterprise Security Policies and Procedures, the Acceptable Use Policy and the Proper Business Practices and Ethics Policy. Prior to entering such information into a prompt for an AI Tool, teammates must confirm that the AI Tool is approved for use by Crown Castle.
- Teammates should thoroughly review all AI Tool outputs before using them or forwarding them to others inside or outside Crown Castle to ensure that they do not improperly use or disclose personal or confidential information; do not contain biased, offensive, or discriminatory content; and to verify accuracy or reported facts with other trusted sources. AI Tools have been known to generate errors or inaccuracies, and it is the teammate's responsibility to provide context, facts, or general information in business communications, contracts, policies, procedures, and other forms of communication to validate the accuracy and completeness of those statements. If there is no way to verify the source of the information, the information should be discarded. AI Tools should not be used blindly for decision making and/or the creation of content. Specifically, teammates should refrain from relying solely on AI algorithms to make critical decisions.
- If a login is required for access to the AI Tool, teammates must use their company-provided email address.
- Teammates are prohibited from using an AI Tool for personnel decision-making purposes (e.g. a decision to hire a job candidate or terminate an employee) without the express written consent of Employee Relations and Legal.
- Teammates may not use AI Tools to engage in any illegal activities or request assistance in performing such activities.
- Teammates may not use offensive, discriminatory, or inappropriate content in conjunction with AI Tools.

Crown Castle shall ensure that the artificial intelligence tools and algorithms it uses in the performance of its activities foster and promote compliance with the principles of equal opportunity, diversity, promotion of inclusion, seeking to avoid unjustifiably discriminatory biases and impacts (based on race, ethnicity, religion, gender, sexual orientation, disability, or any other condition of persons) in the design, development, or application thereof.

Crown Castle shall ensure that the design, development and application of artificial intelligence tools and algorithms by vendors are aligned with this Policy. Crown Castle shall endeavor to ensure that automated processes in which artificial intelligence and/or algorithms are used do not contain limitations on transparency and/or traceability that prevent the objective verification thereof through audit procedures.

Crown Castle shall ensure that the artificial intelligence tools and algorithms it uses in the performance of its activities comply with all applicable legal requirements and are consistent with our [Privacy Statement](#).

Training

To ensure the proper and responsible use of AI Tools, Crown Castle requires all teammates to complete the “AI Policy for Everyone” module, which covers risks and an introduction to ethical practices associated with AI Tools. Additional tool-specific training may be required for access to some AI tools or capabilities. Teammates who fail to complete the training may lose access to AI Tools and/or may face disciplinary actions for using AI Tools without proper training. Information on required and available training can be found on the [AI Tool Showcase SharePoint site](#).

Monitoring & Enforcement

Teammates

Teammates are responsible for adhering to this Policy and ensuring their use of AI Tools aligns with the authorized business purposes outlined above. It is important for teammates to exercise good judgment, professionalism, and respect when interacting with AI Tools.

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment. Violations of this Policy may also result in legal consequences if they involve illegal activities or breach data protection laws.

Teammates are also expected to contact the [Privacy Compliance](#) office via email (privacy.compliance@crowncastle.com) immediately if they become aware of: (i) an actual or possible violation of this policy; or (ii) a breach of data privacy. Reports made under this section will be investigated, Crown Castle may, in its sole discretion, decide to suspend use of the AI Tool during any such investigation. Crown Castle prohibits any form of discipline, reprisal, intimidation, or retaliation for a good faith reporting of a violation of this Policy. Optionally, teammates may contact the [Alert Line](#) to anonymously report any actual or possible violations of this policy (1-866-480-6138).

Managers and Supervisors

Managers and supervisors are responsible for promoting compliance with this Policy within their respective teams. They should provide guidance and clarification to teammates regarding the appropriate use of AI Tools, as well as address any concerns or questions that may arise.

Updating the Policy

As this technology matures, we will continue to evaluate the risks and benefits of using AI Tools at Crown Castle. Any updates to the Policy will be posted on the Connect [Policy and Guidelines page](#).

Questions

Questions regarding this Policy should be directed to the [Privacy Compliance](#) office.

Appendix

Links

[AI Tool Showcase SharePoint site](#)

Glossary

AI Tool - an engineered or machine-based system that can, for a given set of objectives, generate outputs such as predictions, recommendations, or decisions influencing real or virtual environments. AI Tools are designed to operate with varying levels of autonomy.²

Generative AI (GenAI) refers to the use of AI to create new content like text, images, music, audio and video content and is powered by foundation models that can multi-task and perform out-of-the-box tasks, including summarization, Q&A, classification and more.³

Machine Learning (ML) - a subset of AI that uses algorithms trained on data to produce models that can perform complex tasks.⁴

Data Infrastructure - the collection of data storage systems and platforms that Crown Castle uses to manage, process, and analyze its data assets. Data Infrastructure includes on-premises platforms, such as servers and databases, cloud platforms, such as AWS and Azure, and hybrid platforms, such as Snowflake and Databricks, that combine the benefits of both on-premises and cloud solutions.

Sensitive Information – refers to all the Classification Levels in Crown Castle’s Data Classification Policy except for “Public”. This includes Proprietary, High-Risk Confidential, Restricted/Secret and Do Not Store classifications.

² NIST AI Risk Management Framework; (Adapted from: OECD Recommendation on AI:2019; ISO/IEC 22989:2022).

³ <https://cloud.google.com/use-cases/generative-ai>

⁴ AWS: <https://aws.amazon.com/compare/the-difference-between-artificial-intelligence-and-machine-learning/#:~:text=AI%20includes%20everything%20from%20smart,complex%20tasks%20without%20explicit%20instructions.>