

MetLife  
Annuity Operations  
4700 Westown Parkway  
STE 200  
West Des Moines, IA 50266



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**FAX COVER PAGE** 10/29/2025 5:33 PM

To: CDH  
Company Name: METLIFE  
Phone Number:  
Fax Number: 6506804940

From: DMF  
Phone Number:  
Fax Number:

5 pages including this cover sheet  
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**Message:**

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## MetLife Dental

Calendar Year Benefit Period Start Date: January 01



## Benefit summary as of 10/29/2025

Participant's Name: RICKY LAYMAN

Patient: KATHY

Group Name: FEDERAL EMPLOYEES' DENTAL AND VI

Effective Date of Current Coverage: 05/06/2025

Group Num	Sub	Branch	Plan	Coverage
121332	0001	0052	99	EE + 1

Eligibility is not a guarantee of coverage as actual benefit payments are determined only when a claim is processed. Please fax claims to 1-859-389-6505 or mail claims to: MetLife Dental, P.O. Box 981282, El Paso, TX 79998-1282. The mailing address for Appeal and Reconsideration claims is MetLife Group Claims Review, P.O. Box 14589, Lexington, KY 40512. Please bring this document to your dentist. This document will provide the dentist with a comprehensive understanding of your dental benefits plan and assist with planning your dental care.

## Plan Benefits for a FEDERAL DENTAL Dentist

Based on zip code:

Procedure	Coverage Type		Benefit Period	Lifetime Period
Orthodontics	Deductible	Individual Met-to-Date	\$0 \$0	\$0 \$0
		Family Met-to-Date	\$0 \$0	\$0 \$0
	Maximum	Individual Used-to-Date	\$0 \$0	\$3,000 \$0
		Family Used-to-Date	\$0 \$0	\$0 \$0

This section provides information on the level of coverage and how often the services are covered. This listing is not an all-inclusive listing of all possible covered procedures under this plan. Benefits are based on the MetLife PDP fee schedule. Please note the information herein is not a guarantee of coverage. A patient's eligibility and benefits will only be determined at the time a claim is processed by MetLife.

Please note frequency limitations may be combined for like services

## Diagnostic and Preventive Services

Description of Services	Benefit Level	Plan Frequency Limit (if applicable)	Deductible	Up to Age	Last Date of Service
Oral Evaluation (D0120, D0140, D0150, D0180)	NA	Not Available	Yes		
Complete Set Radiographic Images (D0210, D0330)	100%	1 IN 60 CONS MO	Yes		10/06/2011

Bitewing (D0270, D0272, D0273, D0274)	100%	2 PER 1 PERIOD FOR CHILDREN SEPARATED BY 6 MONTHS, 1 PER 1 PERIOD FOR ADULTS (LIBERAL INTERPRETATION)	Yes		
Topical Application Fluoride (D1208, D1206)	NA	Not Available	Yes	22	
Periapical Radiographic Image (D0220, D0230)	100%		Yes		
Prophylaxix Adult (D1110)	100%	1 IN 6 CONS MO	Yes		
Sealant-Per Tooth (D1351)	100%	1 IN 36 CONS MO	Yes	19	
Space Maintainer - Fixed - Unilateral (D1510)	100%		Yes	19	
Prophylaxix Child (D1120)	NA	Not Available	Yes		
Oral Cancer Screening (D0431)	NC	Not Covered			

Sealant coverage is limited to permanent molars excluding wisdom teeth.

### Restorative and Major Services

Description of Services	Benefit Level	Plan Frequency Limit (if applicable)	Deductible	Additional Information Required for Review
Labial Veneer (D2960,D2961,D2962)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment Est & X-rays
Complete Denture - Maxillary (Upper) (D5110)	50%	1 IN 60 CONS MO	Yes	
Osseous Surgery (D4260)	50%	1 IN 36 CONS MO	Yes	Pre-Treatment X-rays & Perio
Localized Delivery of Antimicrobial Agents (D4381)	70%		Yes	Pre-Treatment & Perio
Consultation ( Diagnostic Service Provided by Dentist or Physician Other Than Practitioner Providing Treatment) (D9310)	NA	Not Available	Yes	
Periodontal Scaling and Root Planing- Quadrant (D4341)	70%	1 IN 24 CONS MO	Yes	Pre-Treatment X-rays & Perio
Drugs or Medicaments (D9630)	NC	Not Covered		
Gingival Inflammation (D4346)	100%	1 IN 6 CONS MO	Yes	Pre-Treatment & Perio
Recement Crown (D2920)	70%		Yes	

Oroantral Fistula Closure (D7260)	70%		Yes	
Extraction, Erupted Tooth or Exposed Root (D7140)	70%		Yes	
Occlusal Orthotic Device, by Report (D7880)	NC	Not Covered		
Removable Appliance Therapy (D8210)	NA	Not Available	No	
Gingivectomy or Gingivoplasty (D4211)	50%	1 IN 36 CONS MO	Yes	Pre-Treatment & Perio
Crown - Porcelain fused to noble metal (D2752)	NA	Not Available	Yes	Pre-Treatment X-rays
Occlusal Guards/ Hard Appliance Full Arch (D9944)	50%	1 IN 12 CONS MO	Yes	
Cast Post and Core in Addition to Crown (D2952)	NA	Not Available	Yes	
Palliative (Emergency) Treatment of Detial pain (D9110)	100%		Yes	
Amalgam 1 Surface filling - Adult/Child (D2140)	70%		Yes	
Crown Repair, by report (D2980)	NA	Not Available	Yes	
Root Canal Therapy - Anterior (D3310)	NA	Not Available	Yes	
External Bleaching - per Arch (D9972)	NC	Not Covered		
Gingival Irrigation - Per Quadrant (D4920)	50%		Yes	Pre-Treatment & Perio
Bone Replacement Graft (D7953)	70%		Yes	Pre-Treatment X-rays
Removal of Impacted Tooth- Completely Bony (D7240)	NA	Not Available	Yes	
Pontic - Casthigh noble metal (D6210)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Surgical Placement of implant Endosteal implant (D6010)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Abutment Supported Porcelain/Ceramic Crown (D6058)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Surgical Placement Mini implant (D6013)	NA	Not Available	Yes	

Prefabricated Stainless Steel Crown - Child (D2930)	70%	1 IN 60 CONS MO	Yes	
Periodontal Maintenance (Following Active Therapy) (D4910)	70%	4 IN 12 CONS MO	Yes	Prior Dates of Active Therapy
Prefabricated Stainless Steel Crown - Adult (D2931)	70%	1 IN 60 CONS MO	Yes	

### Plan Provisions

Maximum Age for Non-Orthodontic Services (Up to Age) Child -22 Student -22.

Coordination of Benefits with any other Dental Plan: Coordination of Benefits with a Federal Employees Health Benefits Program (FEHB): The MetLife plan is secondary and coordinates benefits based on Standard Coordination of Benefits. Coordination of Benefits with any other Dental Plan: Standard Coordination of Benefits.

Missing Tooth Exclusion/Prior Loss Clause: Are plan benefits available for teeth lost prior to effective date? YES

This plan provides the alternate benefit of an amalgam filling for composite fillings performed on molar teeth. NO

This plan provides the alternate benefit of a full cast restoration for porcelain or veneer materials on molar teeth. YES

This plan provides the alternate benefit of a full cast restoration for porcelain or veneer crowns on bicuspid teeth. NO

This plan combines the frequency limitation for cleanings and perio maintenance visits. YES The combined limit is 4

This plan pays benefits based on the service: Completion Date..

Extractions performed for orthodontic purposes may be subject to Orthodontic benefit levels.

Benefits for Anesthesia are based on medical necessity.

### Orthodontic Services

Benefits for Orthodontic services are based on medical necessity: NO

Payment Method is: Monthly Repetitive

Percentage Considered at Initial Placement: 25%

Orthodontic Benefit Level: 50%

Remaining benefits for the appliance adjustment visits will be paid automatically on a periodic basis provided that the patient is still eligible for coverage, active treatment is still being rendered, and the lifetime orthodontic maximum benefits have not been exceeded

Maximum age for Orthodontics (up to Age) Child 0, Student 0, Adult 99

Like most dental benefit plans, MetLife's dental plans contain certain exclusions and limitations. The patient should refer to his/her plan booklet for complete plan details. All claims submitted are subject to MetLife's standard processing guidelines and reviews. In some cases it may be determined that an alternative method of treatment is as appropriate and cost-effective. A pretreatment estimate is recommended before the start of extensive dental treatment such as crowns, veneers, bridgework, implants or treatment related to periodontal services, TMJ or orthodontics.

Date: October 30, 2025



**FAX**

**To: Health Care Professional**

**Fax: (650)680-4940**

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**Eligibility and benefit information provided is based on current records and is not a guarantee of coverage.**

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**Additional questions or problems with this transmission? Call us toll-free at 1-800-88Cigna (1-800-882-4462):**

## Cigna Dental

## Cigna DENTAL FAX TRANSMISSION - FOR OFFICE USE ONLY

This information is provided based on data in our eligibility records as of this date. It does not reflect retroactive changes to eligibility that we have not yet received; therefore, this does not guarantee eligibility or covered benefits. Additionally, there may be other covered benefits not shown within this document. If you need more information, please call and speak with a Customer Service Agent. Please do not disclose the information contained within this document to persons other than the patient or his/her authorized representative, the patient's legal guardian and this office as necessary to provide services.

Today's Date: 10/30/2025  
 MEMBER NAME: SHELLY TOWELL  
 MEMBER STATUS: Active  
 MEMBER EFFECTIVE DATE: 01/01/2023  
 TERMINATION DATE: None

MEMBER ACCOUNT NUMBER: 2501702  
 MEMBER NUMBER: U43200763  
 PRODUCT NAME: Dental PPO  
 NETWORK NAME: TOTAL

Claim Office Mailing Address: Cigna Dental, Post Office Box 188037, Chattanooga, Tennessee 37422-8037

<u>Deductibles</u>	<u>In-Network</u>		<u>Out-Of-Network</u>	
	Individual	Family	Individual	Family
Calendar Year Deductible	\$100.00	/ \$300.00	\$100.00	/ \$300.00
Amount Satisfied	\$0.00	/ \$0.00	\$0.00	/ \$0.00
Lifetime Orthodontic Deductible	\$0.00	/ \$0.00	\$0.00	/ \$0.00
Amount Satisfied	\$0.00	/ \$0.00	\$0.00	/ \$0.00
<u>Maximums</u>	<u>Individual / Family</u>		<u>Individual / Family</u>	
Calendar Year Maximum	\$2,000.00	/ \$0.00	\$2,000.00	/ \$0.00
Amount Used	\$123.00	/ \$0.00	\$123.00	/ \$0.00
Lifetime Orthodontic Maximum	\$2,000.00	/ \$0.00	\$2,000.00	/ \$0.00
Amount Used	\$0.00	/ \$0.00	\$0.00	/ \$0.00

<u>Plan's Coinsurance Percentages</u>	<u>In-Network</u>		<u>Out-Of-Network</u>	
	Reimbursement:		Reimbursement:	
Class 1	100%		100%	
Class 2	80%		70%	
Class 3	50%		40%	
Class 4	50%		40%	
Class 5	80%		70%	
Class 9	50%		40%	

<u>Frequency and Age Limitations</u> Specific Coverage Information	<u>In-Network</u>		<u>Out-Of-Network</u>	
<b>Non-Orthodontic</b>				
Dependent Age Limitation	26		26	
Student Age Limitation	26		26	
Date Coverage Ends	Birth Month		Birth Month	
<b>Orthodontic</b>				
Dependent Age Limitation				
Student Age Limitation				
Date Coverage Ends	Birth Month		Birth Month	
<b>Missing Tooth</b>				
Time Period Limitation	N/A		N/A	
Coinurance Reduction				
<b>COB Payment Provision</b>				
Type of Coverage	Non-Duplicating		Non-Duplicating	

<u>Procedure / Class</u>	<u>In-Network</u>		<u>Out-Of-Network</u>	
	Frequency/Age Limit		Frequency/Age Limit	
D0120 / 1	2 per 1 calendar year		2 per 1 calendar year	
D0272 / 1	1 per 1 calendar year		1 per 1 calendar year	
D0210 / 1	1 per 5 consecutive years		1 per 5 consecutive years	
D1110 / 1	2 per 1 calendar year		2 per 1 calendar year	
D1208 / 1	1 per 1 calendar year		1 per 1 calendar year	
	Under Age 19		Under Age 19	
D1351 / 1	1 per 36 consecutive months		1 per 36 consecutive months	
	Under Age 19		Under Age 19	
D2750 / 3	1 per 7 consecutive years		1 per 7 consecutive years	
D6750 / 3	1 per 7 consecutive years		1 per 7 consecutive years	
D8082 / 4	No Limitations		No Limitations	

Please note that the coinsurance percentages and maximum amounts may differ for each family member based on services received for that member during the prior plan year.

Plan payments for out-of-network treatment are based upon specified percentiles of Reasonable and Customary or fixed schedules, depending on the employer's plan. Fields that display zero as the Patient's Coinsurance Percent indicate that Cigna covers this service at 100% of plan allowance.

Additional questions or problems with this transmission? Call us toll-free at 1-800-Cigna24 (1-800-244-6274)



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4700 Westown Parkway  
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Patient: KATHY

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Topical Application Fluoride (D1208, D1206)	NA	Not Available	Yes	22	
Periapical Radiographic Image (D0220, D0230)	100%		Yes		
Prophylaxix Adult (D1110)	100%	1 IN 6 CONS MO	Yes		
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Space Maintainer - Fixed - Unilateral (D1510)	100%		Yes	19	
Prophylaxix Child (D1120)	NA	Not Available	Yes		
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Localized Delivery of Antimicrobial Agents (D4381)	70%		Yes	Pre-Treatment & Perio
Consultation ( Diagnostic Service Provided by Dentist or Physician Other Than Practitioner Providing Treatment) (D9310)	NA	Not Available	Yes	
Periodontal Scaling and Root Planing- Quadrant (D4341)	70%	1 IN 24 CONS MO	Yes	Pre-Treatment X-rays & Perio
Drugs or Medicaments (D9630)	NC	Not Covered		
Gingival Inflammation (D4346)	100%	1 IN 6 CONS MO	Yes	Pre-Treatment & Perio
Recement Crown (D2920)	70%		Yes	

Oroantral Fistula Closure (D7260)	70%		Yes	
Extraction, Erupted Tooth or Exposed Root (D7140)	70%		Yes	
Occlusal Orthotic Device, by Report (D7880)	NC	Not Covered		
Removable Appliance Therapy (D8210)	NA	Not Available	No	
Gingivectomy or Gingivoplasty (D4211)	50%	1 IN 36 CONS MO	Yes	Pre-Treatment & Perio
Crown - Porcelain fused to noble metal (D2752)	NA	Not Available	Yes	Pre-Treatment X-rays
Occlusal Guards/ Hard Appliance Full Arch (D9944)	50%	1 IN 12 CONS MO	Yes	
Cast Post and Core in Addition to Crown (D2952)	NA	Not Available	Yes	
Palliative (Emergency) Treatment of Detial pain (D9110)	100%		Yes	
Amalgam 1 Surface filling - Adult/Child (D2140)	70%		Yes	
Crown Repair, by report (D2980)	NA	Not Available	Yes	
Root Canal Therapy - Anterior (D3310)	NA	Not Available	Yes	
External Bleaching - per Arch (D9972)	NC	Not Covered		
Gingival Irrigation - Per Quadrant (D4920)	50%		Yes	Pre-Treatment & Perio
Bone Replacement Graft (D7953)	70%		Yes	Pre-Treatment X-rays
Removal of Impacted Tooth- Completely Bony (D7240)	NA	Not Available	Yes	
Pontic - Casthigh noble metal (D6210)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Surgical Placement of implant Endosteal implant (D6010)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Abutment Supported Porcelain/Ceramic Crown (D6058)	50%	1 IN 60 CONS MO	Yes	Pre-Treatment X-rays
Surgical Placement Mini implant (D6013)	NA	Not Available	Yes	

Prefabricated Stainless Steel Crown - Child (D2930)	70%	1 IN 60 CONS MO	Yes	
Periodontal Maintenance (Following Active Therapy) (D4910)	70%	4 IN 12 CONS MO	Yes	Prior Dates of Active Therapy
Prefabricated Stainless Steel Crown - Adult (D2931)	70%	1 IN 60 CONS MO	Yes	

### Plan Provisions

Maximum Age for Non-Orthodontic Services (Up to Age) Child -22 Student -22.

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This plan provides the alternate benefit of a full cast restoration for porcelain or veneer materials on molar teeth. YES

This plan provides the alternate benefit of a full cast restoration for porcelain or veneer crowns on bicuspid teeth. NO

This plan combines the frequency limitation for cleanings and perio maintenance visits. YES The combined limit is 4

This plan pays benefits based on the service: Completion Date..

Extractions performed for orthodontic purposes may be subject to Orthodontic benefit levels.

Benefits for Anesthesia are based on medical necessity.

### Orthodontic Services

Benefits for Orthodontic services are based on medical necessity: NO

Payment Method is: Monthly Repetitive

Percentage Considered at Initial Placement: 25%

Orthodontic Benefit Level: 50%

Remaining benefits for the appliance adjustment visits will be paid automatically on a periodic basis provided that the patient is still eligible for coverage, active treatment is still being rendered, and the lifetime orthodontic maximum benefits have not been exceeded

Maximum age for Orthodontics (up to Age) Child 0, Student 0, Adult 99

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# Voicecare Technologies, Inc.

## AI Governance Policy (v1.0)

### SOC 2 Trust Services Criteria:

CC1.1, CC1.2, CC2.1, CC3.2, CC5.2

### ISO/IEC 27001 Annex A:

A.5.1.1, A.6.1.5, A.18.1.4

### Keywords:

AI Governance, Responsible AI, Ethical AI, Data Privacy, Human Oversight, Model Risk

**Policy Owner:** Security Officer

**Effective Date:** December 15, 2025

**Applies To:** Employees, contractors, and third parties using or developing AI on behalf of Voicecare

## 1. Purpose

This AI Governance Policy establishes requirements for the responsible, ethical, and secure use of artificial intelligence (“AI”) technologies at Voicecare Technologies, Inc. (“Voicecare”). The policy ensures AI use supports business objectives while protecting data privacy, maintaining regulatory compliance, and mitigating ethical and operational risk.

## 2. Scope

This policy applies to all workforce members, contractors, and partners who:

- Use AI tools
- Develop AI-enabled features
- Integrate third-party AI services
- Make decisions influenced by AI-generated outputs

## Roles & Responsibilities

This policy recognizes the importance of involving and addressing the concerns of various stakeholders throughout the AI lifecycle. The key stakeholders include, but are not limited to:

- Organizational Leadership: Responsible for setting the strategic direction for AI governance, allocating resources, and ensuring compliance.
- AI Development Teams: Comprising data scientists, engineers, and developers responsible for designing, building, and maintaining AI systems.
- Legal and Compliance Teams: Responsible for ensuring that AI systems comply with relevant laws, regulations, and industry standards.
- Ethics Review: Ethical considerations for AI use cases are reviewed by designated members of Leadership, Compliance, and Security as part of risk assessment and approval activities.
- Data Privacy Officers: Responsible for safeguarding individuals' privacy rights and ensuring compliance with data protection laws.
- Security Teams: Responsible for assessing and addressing the security risks associated with AI systems.
- Users and Customers: Individuals and organizations that interact with AI systems, whose interests and experiences must be considered.
- Regulatory Authorities: Relevant governmental agencies that oversee AI-related activities, whose guidance and

- compliance requirements must be adhered to.
- Community and Society at Large: The broader public and society, whose trust and well-being must be considered when deploying AI systems that impact the community.

## Laws and Regulations

Voicecare will abide by, and comply with, any AI-related laws and regulations that may be applicable to it. Personnel and AI stakeholders will be made aware of these laws and regulations, and their impact on AI-related design, development, and deployment activities. A list of these laws and regulations are outlined in *Appendix A*.

## Definitions

Voicecare maintains a glossary of AI-related terms in *Appendix B*.

## Policy

Voicecare will adhere to the following guidelines in conjunction with other rules, policies and procedures for a holistic approach to responsible AI practices.

## Context

Voicecare deploys AI systems in limited, defined business contexts primarily to support operational efficiency, analytics, and customer-facing functionality. AI systems are deployed in controlled environments, reviewed prior to production use, and monitored throughout their lifecycle.

## Stakeholders

Voicecare will ensure that its AI stakeholders are proficient, trained, and equipped with the resources necessary to manage AI systems through their entire lifecycle. This includes:

- Identifying skills and proficiency requirements for operators, practitioners and other domain experts that interact with AI systems.
- Defining and developing training materials for proposed end users, practitioners and operators about AI system use and known limitations.
- Defining and developing certification procedures for operating AI systems within defined contexts of use, and information about what exceeds operational boundaries.
- Developing AI system operational documentation for AI actors in deployed and operational environments, including information about known risks, mitigation criteria, and trustworthy characteristics
- Developing approaches to track human-AI configurations, operator, and practitioner outcomes for integration into continual improvement.
  - Identifying and declaring AI system features and capabilities that may affect downstream AI actors' decision-making in deployment and operational settings for example how system features and capabilities may activate known risks in various human-AI configurations, such as selective adherence.
- Including operators, practitioners and end users in AI system prototyping and testing activities to help inform operational boundaries and acceptable performance. Conduct testing activities under scenarios similar to deployment conditions.
- Verifying that design principles are in place for safe operation by AI actors in decision-making environments.
- Verifying model output provided to AI system operators, practitioners and end users is interactive, and specified to context and user requirements
- Verifying AI system output is interpretable and unambiguous for downstream decision making tasks.

## **Training**

Voicecare provides AI-related training and guidance to personnel involved in the development, deployment, or oversight of AI systems. General security and acceptable use training addresses AI-related risks for all workforce members.

- Applicable laws and regulations for AI systems
- Potential negative impacts of AI systems
- Company policies addressing responsible AI practices
- Trustworthy AI characteristics
- Change management and mechanisms to communicate and acknowledge substantial AI system changes
- Paths along internal and external chains of accountability to escalate AI risk concerns

Voicecare will ensure that training and education will:

- Comprehensively address technical and socio-technical aspects of AI risk management
- Be acknowledged by personnel

## **Human Oversight**

Voicecare will practice oversight of AI systems in accordance with organizational policies. To ensure an effective oversight process, Voicecare will:

- Identify and document AI systems' features and capabilities that require human oversight, in relation to operational and societal contexts, trustworthy characteristics, and applicable risks.
- Evaluate AI system oversight practices for validity and reliability. When oversight practices undergo extensive updates or adaptations, retest, evaluate results, and course correct as necessary.
- Verify that model documents contain interpretable descriptions of system mechanisms, enabling oversight personnel to make informed, risk-based decisions about system risks.

## **Feedback**

Voicecare will have a system in place to allow for:

- Input from stakeholders, users, impacted individuals and communities
- Regular communication and feedback from and between relevant AI actors and internal/external stakeholders related to:
- Information about system performance, trustworthiness, and impact
- System design or deployment decisions

To increase awareness of insights, feedback will be evaluated in close collaboration with AI actors responsible for impact assessment, human-factors, and governance and oversight tasks, as well as with other socio-technical domain experts and researchers. To ensure feedback is being successfully collected and evaluated from AI stakeholders,

- The feedback capture will be
  - Conducted in settings where end users are able to openly share their doubts and insights about AI system output, and in connection to their specific context of use (including setting and task-specific lines of inquiry).
  - Developed and implemented by human-factors and socio-technical domain experts and researchers.
  - Designed to ensure control of interviewer and end user subjectivity and biases
- Approaches will be identified and documented (a) for evaluating and integrating elicited feedback from system end users, (b) in collaboration with human-factors and socio-technical domain experts, (c) to actively inform a process of continual improvement.
- Feedback from end users will be evaluated alongside evaluated feedback from impacted communities.

- End user feedback will be utilized to investigate how selected metrics and measurement approaches interact with organizational and operational contexts.
- System-internal measurement processes will be analyzed and documented in comparison to collected end user feedback.
- Feedback inputs will be integrated to assess AI system trustworthiness characteristics.
  - Feedback will be evaluated regarding end user satisfaction with, and confidence in, AI system performance including whether output is considered valid and reliable, and explainable and interpretable.
  - Mechanisms will be identified to confirm/support AI system output (e.g., recommendations), and end user perspectives about that output.
  - Frequency of AI systems' override decisions will be measured and results will be evaluated and documented, and insights will be fed back into continual improvement processes.
  - Efficacy of end user and operator error reporting processes will be measured.
  - Type and rate of end user appeal requests and results will be categorized and analyzed.
  - Feedback activity participation rates and awareness of feedback activity availability will be measured.
  - Feedback will be utilized to analyze measurement approaches and determine subsequent courses of action.
  - Measurement approaches will be evaluated to determine efficacy for enhancing organizational understanding of real world impacts.
  - End user and community feedback will be analyzed in close collaboration with domain experts.

## Continual Improvement

To ensure protocols, resources, and metrics are in place for continual monitoring of AI systems' performance, trustworthiness, and alignment with contextual norms and values, Voicecare will Integrate trustworthiness characteristics into protocols and metrics used for continual improvement. The company will:

- Establish processes for evaluating and integrating feedback into AI system improvements.
- Assess and evaluate alignment of proposed improvements with relevant regulatory and legal frameworks
- Assess and evaluate alignment of proposed improvements connected to the values and norms within the context of use.
- Document the basis for decisions made relative to tradeoffs between trustworthy characteristics, system risks, and system opportunities.
- Maintain version history information and metadata.

## System Management

Voicecare promotes independent course correction of AI systems, as such, it ensures that AI system development functions are managed separately from AI system testing functions.

### *System Inventories*

Voicecare regularly maintains its inventory of AI models or systems per the company *Asset Management Policy*. The inventory accounts for each system's documentation, links to source code, incident response plans, data dictionaries and AI actor contact information. It will also indicate the pertinent checks for the model/system. Additionally,

- If external mechanisms are used to inventory AI systems, such mechanisms are resourced according to the company's risk priorities.
- Pre-trained models will be identified within the inventory for purposes of risk tracking.
- If only selected models or systems are inventories, all models or systems will be appropriately classified and the selected ones will be identified and documented for inventory purposes.

## **System Decommissioning**

Voicecare has appropriate processes and procedures in place for decommissioning and phasing out AI systems safely, which will take into consideration:

- Regulatory requirements
- User and community concerns
- Business continuity
- Financial and Reputational Risks
- System dependencies
- Migration to a new (replacement) system

## **Business Continuity and Incident Management**

Voicecare will ensure business continuity and respond to AI-related incidents per the company's *Business Continuity* and *Incident Response* plans. To account for AI-specific situations, the following guidelines will be implemented as well.

For business continuity, Voicecare will:

- Regularly review established procedures for AI system bypass actions, including plans for redundant or backup systems to ensure continuity of operational and/or business functionality.
- Regularly review and identify incident thresholds for activating bypass or deactivation responses.
- Apply change management processes to understand the upstream and downstream consequences of bypassing or deactivating an AI system or AI system components.
- Maintain a database of system changes, reason for change, and details of how the change was made, tested and deployed.
- Apply protocols, resources and metrics for decisions to supersede, bypass or deactivate AI systems or AI system components.
- Verify that handling third-party system failures include consideration of redundancy mechanisms for vital third-party AI systems.

For incident management and response, Voicecare will:

- Preserve materials for forensic, regulatory, and legal review.
- Conduct internal root cause analysis and process reviews of bypass or deactivation events.
- Maintain a database of reported errors, near-misses, incidents and negative impacts including date reported, number of reports, assessment of impact and severity, and responses.
- Regularly share information about errors, incidents and negative impacts with relevant stakeholders, operators, practitioners and users, and impacted parties.
- Share information about errors, near-misses, and attack patterns with incident databases, other organizations with similar systems, and system users and stakeholders.
- Maintain information sharing practices with AI actors from other organizations to learn from common attacks.
- Establish and track AI system security tests and metrics (e.g., red-teaming activities, frequency and rate of anomalous events, system down-time, incident response times, time-to-bypass, etc.).
  - Use red-team exercises to actively test the system under adversarial or stress conditions, measure system response, assess failure modes or determine if the system can return to normal function after an unexpected adverse event.
  - Document red-team exercise results as part of continuous improvement efforts, including the range of security test conditions and results.
- Use countermeasures (e.g., authentication, throttling, differential privacy, robust ML approaches) to increase the range of security conditions under which the system is able to return to normal function.
- Modify system security procedures and countermeasures to increase robustness and resilience to attacks in response to testing and events experienced in production.
- Verify that relevant AI actors responsible for identifying complex or emergent risks are properly resourced and

empowered.

- Verify that third party AI resources and personnel undergo security audits and screenings. Risk indicators may include failure of third parties to provide relevant security information.

## APPENDIX A

### Applicable Laws and Regulations

Type	Title	Requirements / Notes	Responsible Party
International	GDPR (EU), where applicable	Applies if personal data of EU residents is processed	Security Officer
United States (Federal)	HIPAA (45 CFR Parts 160 & 164)	Applies where AI systems process or interact with Protected Health Information (PHI)	Security Officer
United States (Federal)	FTC Act (Unfair or Deceptive Practices)	Applies to transparency, fairness, and representations related to AI use	Security Officer
United States (State)	State privacy laws (e.g., CCPA/CPRA, where applicable)	Applies based on customer data, geography, and contractual obligations	Security Officer
Industry / Contractual	SOC 2 Trust Services Criteria	Governs security, availability, confidentiality, and privacy controls	Security Officer

## APPENDIX B

### Glossary of AI-Related Terms

**Accountability:** The obligation and responsibility of the creators, operators and regulators of an AI system to ensure the system operates in a manner that is ethical, fair, transparent and compliant with applicable rules and regulations. Accountability ensures that actions, decisions and outcomes of an AI system can be traced back to the entity responsible

for it.

*Algorithm:* A computational procedure or set of instructions and rules designed to perform a specific task, solve a particular problem, or produce a machine learning or AI model.

*Artificial Intelligence (AI):* A broad term used to describe an engineered system where machines learn from experience, adjusting to new inputs, and potentially performing tasks previously done by humans. More specifically, it is a field of computer science dedicated to simulating intelligent behavior in computers. It may include automated decision-making.

*AI Model:* A software that has been trained on a set of data to perform specific tasks like recognizing certain patterns. It typically involves some input data, a pattern-matching algorithm, and an output classification.

*AI System:* Any software, hardware, or system that employs artificial intelligence, machine learning, or other related technologies to make autonomous decisions, provide recommendations, or process data.

*Bias:* Bias can impact outcomes and pose a risk to individual rights and liberties. There are several types of bias within the AI field.

- Computational bias is a systematic error or deviation from the true value of a prediction that originates from a model's assumptions or the data itself.
- Cognitive bias refers to inaccurate individual judgment or distorted thinking, while societal bias leads to systemic prejudice, favoritism, and/or discrimination in favor of or against an individual or group.

*Explainability:* The ability to describe or provide sufficient information about how an AI system generates a specific output or arrives at a decision in a specific context to a predetermined addressee. Explainability is important in maintaining transparency and trust in AI.

*Fairness:* An attribute of an AI system that ensures equal and unbiased treatment of individuals or groups in its decisions and actions in a consistent, accurate manner. It means the AI system's decisions should not be affected by certain sensitive attributes like race, gender or religion.

*Generative AI:* A field of AI that uses machine learning models trained on large data sets to create new content, such as written text, code, images, music, simulations and videos. These models are capable of generating novel outputs based on input data or user prompts.

*Input Data:* Data provided to or directly acquired by a learning algorithm or model for the purpose of producing an output. It forms the basis upon which the machine learning model will learn, make predictions and/or carry out tasks.

*Machine Learning:* A subfield of AI involving algorithms that enable computer systems to iteratively learn from and then make decisions, inferences or predictions based on data (see also input data). These algorithms build a model from training data to perform a specific task on new data without being explicitly programmed to do so.

Machine learning implements various algorithms that learn and improve by experience in a problem-solving process that includes data cleansing, feature selection, training, testing and validation. Companies and government agencies deploy machine learning algorithms for tasks such as fraud detection, recommender systems, customer inquiries, natural language processing, health care, or transport and logistics.

*Oversight:* The process of effectively monitoring and supervising an AI system to minimize risks, ensure regulatory compliance and uphold responsible practices. Oversight is important for effective AI governance, and mechanisms may include certification processes, conformity assessments and regulatory authorities responsible for enforcement.

*Safety:* The development of AI systems that are designed to minimize potential harm to individuals, society, property and the environment.

*Stakeholders:* Internal and external interdisciplinary teams (to include developers, engineers, data analysts, researchers, experts, end users) with a wide range of skills, competencies, and capabilities who will affect and could be

affected by AI systems, and provide input, feedback, expertise, and functionality.

*Testing Data:* A subset of the data set used to provide an unbiased evaluation of a final model. It is used to test the performance of the machine learning model with new data at the very end of the model development process.

*Training Data:* A subset of the data set that is used to train a model until it can accurately predict outcomes, find patterns or identify structures within the training data.

*Transparency:* The extent to which information regarding an AI system is made available to stakeholders, including if one is used and an explanation of how it works. It implies openness, comprehensibility and accountability in the way AI algorithms function and make decisions.

*Trustworthy AI:* In most cases used interchangeably with the terms responsible AI and ethical AI, which all refer to principle-based AI development and governance, including the principles of security, safety, transparency, explainability, accountability, privacy, non-discrimination/non-bias , among others.

*Validation Data:* A subset of the data set used to assess the performance of the model during the training phase. Validation data is used to fine-tune the parameters of a model and prevent overfitting before the final evaluation using the test data set.

### ***Revision History***

<b>Version</b>	<b>Date</b>	<b>Editor</b>	<b>Approver</b>	<b>Description of Changes</b>	<b>Format</b>

# **Voicecare Technologies, Inc.**

## **Acceptable Use Policy (v2.0)**

### **SOC 2 Trust Services Criteria:**

CC1.1, CC1.4, CC1.5, CC2.2, CC5.2, CC6.1, CC6.2, CC7.1

### **ISO/IEC 27001 Annex A:**

A.5.1, A.6.3, A.8.1, A.8.2, A.8.3, A.12.2, A.12.6

### **Keywords:**

Acceptable Use, System Access, Remote Work, Device Security, Encryption, Malware Protection, Monitoring, Security Awareness

**Policy Owner:** Security Officer

**Effective Date:** December 15, 2025

**Applies To:** Employees, contractors, consultants, and authorized third parties

## **1. Purpose**

The Acceptable Use Policy (“AUP”) defines acceptable and prohibited use of Voicecare Technologies, Inc. (“Voicecare”) information systems, devices, networks, applications, and data. The objective is to protect the confidentiality, integrity, and availability of company and client information and to ensure compliance with security, privacy, and contractual obligations.

## **2. Scope**

This policy applies to all workforce members and third parties who access Voicecare systems or data, regardless of location or employment type. All users are considered remote users unless otherwise designated.

## **3. Acceptable Use**

Voicecare systems may be used solely for legitimate business purposes. Limited personal use is permitted provided it:

Does not interfere with job responsibilities

Does not consume excessive system resources

Does not violate any Voicecare policy, law, or contractual obligation

Users must comply with all security, privacy, and data handling requirements at all times.

## **4. Prohibited Activities**

The following activities are strictly prohibited:

Accessing, storing, transmitting, or displaying illegal, offensive, or inappropriate content

Attempting to bypass, disable, or circumvent security controls, authentication mechanisms, or monitoring tools

Sharing passwords, MFA tokens, API keys, or access credentials

Installing or using unapproved software, services, or AI tools  
Connecting unauthorized devices to Voicecare systems or networks  
Accessing systems or data without explicit authorization  
Introducing malware, malicious code, or insecure configurations  
Using Voicecare systems for personal financial gain or outside business activities  
Posting confidential or sensitive information to public forums or collaboration tools

## **5. Device & System Security**

All users must:

Use only Voicecare-approved devices and software  
Enable full-disk encryption on laptops and mobile devices  
Ensure endpoint protection and anti-malware tools remain enabled  
Secure devices when unattended and prevent unauthorized access  
Immediately report lost, stolen, or compromised devices  
Confidential company data may not be stored on personal devices unless explicitly approved.

## **6. Data Protection & Confidentiality**

Users must:

Handle data in accordance with its classification  
Encrypt sensitive or confidential data in transit and at rest  
Avoid transmitting confidential data via unapproved channels  
Follow the Privacy, Use & Disclosure Policy and Incident Response Policy  
Any suspected data loss, privacy incident, or security event must be reported immediately.

## **7. Monitoring & Privacy**

Voicecare reserves the right to monitor, log, and review system usage to ensure compliance with security and legal requirements. Users should have no expectation of privacy when using Voicecare systems.

## **8. Violations & Enforcement**

Violations of this policy may result in disciplinary action up to and including termination of employment or contract, and may result in legal action. Voicecare applies a fair and proportional disciplinary process based on the nature and severity of the violation.

## 9. Acknowledgment

All users must acknowledge and comply with this Acceptable Use Policy as a condition of access to Voicecare systems.

### Revision History

Version	Date	Editor	Description of Changes
			Initial Creation
v2.2	12/14/2025	Emily Deere	Updating to Q4 2025 policies