



Responsible AI Guidelines

Transforming lives, through Responsible AI

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1. Introduction

1.1 Our mission

At Lucid, artificial intelligence (AI) is a tool we use to advance our mission of *Transforming Lives. Always*. We are catalysts for change, creating momentum that shifts behaviour and delivers lasting impact.

We achieve this by fusing commercial ingenuity, scientific rigour, behavioural insight, creative storytelling and strategic foresight into outcome-focused programmes.

These Responsible AI Guidelines set the guardrails that enable Lucid to innovate responsibly and in compliance with applicable laws and standards. They ensure we protect people and data through lawful, ethical and transparent practices, sustaining trust with clients, employees and society.

To introduce these guidelines, Jo Troman (President, Functional Excellence) shares her reflections on why responsible AI matters to Lucid and how it connects to our mission.



At Lucid, our purpose has always been clear: to transform lives through the power of communication, science and belief. Artificial intelligence amplifies that mission, giving us new ways to uncover insights, translate evidence into action, and accelerate impact for our clients and the communities they serve.

Yet, as AI expands what's possible, it also deepens our responsibility. The choices we make about how we design, apply, and govern these technologies will shape not just our work, but the trust others place in it.

At Lucid, our values guide how we design, deploy and govern AI. They ensure that technology reflects the same humanity, accountability, curiosity, innovation and purpose that define our work. Through these values, we commit to using AI in ways that are safe, transparent, meaningful, and continuously evolving, amplifying our ability to transform lives while staying true to who we are.

Our responsible AI framework outlines how we will apply these principles today, and how we will continue to refine them as the landscape evolves. It is intentionally iterative, recognising that as AI advances, so must our understanding of its risks, opportunities and obligations.

*Ultimately, we believe that **AI should enhance human potential, not replace it**. It should help us see more clearly, act more confidently and serve more compassionately. By approaching AI with the same scientific rigour, creativity and humanity that define Lucid, we will ensure that technology strengthens, rather than compromises, the integrity of our work and the trust of those we serve.*

1.2 Our values

Our Responsible AI Guidelines are led by Lucid's Values. Our values act as a compass, shaping how AI is conceived, designed and deployed across Lucid.

Compassionately Human

Being compassionately human means putting people first. In AI, this means prioritising safety, fairness and wellbeing in every use case. We ensure AI augments human judgement rather than replacing it, with our 'human in the loop' commitment ensuring empathy and equity is always at the heart of how we use AI.

Invent with Intent

Inventing with intent means designing meaningful solutions that address real problems. AI empowers us to improve efficiency, lighten administrative burdens, and redirect our focus toward the work that truly matters – the work that transforms lives. We also harness AI as a tool for disruptive creativity, enabling new forms of impact and innovation.

Accountable Allies

As accountable allies, we share responsibility with colleagues, clients and partners. In AI, this means transparency in how systems work, clear roles and responsibilities, as well as a commitment to protect client data and uphold contractual obligations. This enables us to do higher-value work for our clients as a trusted, AI-enabled partner.

Courageously Curious

Courageous curiosity drives us to explore new possibilities while recognising the risks. With AI, this means embracing its potential responsibly: experimenting boldly, but always with guardrails, governance and a clear sense of purpose; our approach to AI evolves continuously, shaped by the needs of our clients, our people and the wider society we serve.

2. Purpose and objectives

2.1 Purpose of this document

The purpose of this document is to set out Lucid's approach to responsible AI for our people, clients, suppliers and stakeholders.

For Lucid employees and contractors

These guidelines empower us to use AI confidently and responsibly, providing us the tools and guardrails to innovate while staying true to our mission and values. They ensure our use of AI drives work that truly transforms lives.

For clients and partners

These guidelines reflect our role as trusted partners and as an extension of your team. They outline how we protect your data, in accordance with applicable privacy and security laws, and how we fulfil our contractual commitments. We use AI as a catalyst for change – always guided by ethics, transparency and accountability.

This document marks Lucid's formal commitment to harness AI boldly and responsibly, within a clear legal, ethical and governance framework. In partnership with our clients, we unlock insights, mobilise causes and drive outcomes that deliver lasting impact.

2.2 Goals

Lucid is committed to the ethical, responsible and effective use of AI in our operations and services. These Responsible AI Guidelines establish a governance and compliance framework. This framework ensures that all AI systems and tools used at Lucid are developed and used in ways that are trustworthy, lawful and aligned with applicable regulations and international best practices (including data protection and emerging AI laws).

Our goals are to:

1. Ensure alignment

Align AI initiatives with Lucid's mission, goals, and legal and contractual obligations, ensuring AI development and use are purposeful, ethical and consistent with who we are. Each AI initiative should strengthen our partnerships and empower our clients, driving innovation and positive impact in a transparent and compliant manner.

2. Ensure ethical AI use

Uphold high ethical standards, legal obligations and human values in all AI activities, protecting individuals, clients and the communities we serve. We commit to embedding principles of fairness, dignity, accountability and equity in every project in accordance with applicable data protection, equality and AI governance laws. We commit to data protection and bias mitigation through human oversight, care and transparency. We align closely with our people to ensure AI is used responsibly and that its outputs are inclusive and representative of the diverse patient communities we serve.

3. Build trust and transparency

Enhance stakeholder trust in our AI-driven solutions by being open about how our AI systems operate and by providing clear explanations for AI-driven outcomes. We ensure our clients' data remains safe, protecting its integrity, confidentiality and security at all times, in compliance with data protection, confidentiality and information security obligations.

4. Manage risk and compliance

Proactively identify, assess, and manage risks related to privacy, security, fairness and reliability. We ensure compliance with applicable global laws and standards (e.g., GDPR, UK Data Protection Act 2018 EU AI Act, UK Online Safety Act and US consumer protection and Federal Trade Commission (FTC) requirements) through strong governance and continual, ongoing monitoring. We are working towards formal ISO 42001 certification in 2026, demonstrating Lucid's leadership and reflecting our ongoing commitment to global best practice in responsible AI.

5. Foster responsible innovation

Encourage innovative and creative use of AI to drive efficiency, insight and innovation, always within a clearly defined, responsible and legally compliant framework that aligns with our governance and compliance standards. AI should augment human expertise, not replace human judgement in decisions with material or ethical impact, and must operate under defined oversight. This balance enables Lucid to harness cutting-edge technologies responsibly, while also protecting people, data, and our client's trust.

6. Embed ESG considerations

Integrate environmental, social and governance (ESG) considerations into all aspects of AI use, including minimising energy consumption and carbon footprint. Lucid has science-based greenhouse gas (GHG) targets registered with the Science Based Targets initiative (SBTi)* and is committed to understanding the evolving emissions landscape of AI. This includes assessing the greenhouse gas impact of our AI use and its implications for our carbon reduction strategy. We apply transparency and integrity in assessing and communicating our emissions impact, using recognised reporting methodologies and verification standards where applicable, and ensuring our approach remains equitable, responsible and aligned with our sustainability goals.

***Lucid SBTi targets:** *Lucid Group Communications Ltd commits to reduce scope 1 and scope 2 GHG emissions 46% by 2030 from a 2019 base year, and to measure and reduce its scope 3 emissions, subject to periodic review and external verification in line with evolving regulatory requirements.*

3. Scope and applicability

These guidelines apply to all AI systems, tools and use cases at Lucid. They cover AI that we develop in house, AI services we use from third parties, and AI solutions integrated by our vendors and partners. They apply to all Lucid Group entities and operations, and to any AI activity conducted on Lucid's behalf, within the limits of our contractual and legal control. Compliance with these guidelines does not extend to client- or partner-owned systems unless expressly agreed in writing.

3.1 Internal AI development

All projects that build AI or machine learning models on Lucid platforms, including Azure, AWS, or our future proprietary Lucid AI platform (powered by Azure-hosted models such as OpenAI, Grok, Meta, etc.), must follow these guidelines and comply with all applicable data protection, intellectual property and contractual requirements. This applies across the full AI lifecycle, from design and data handling through to deployment, monitoring and retirement. Where third-party or hosted models are used, teams must ensure appropriate data use, confidentiality and licensing terms are in place before processing client or personal data.

3.2 Third-party AI tools

The use of external AI-powered services (e.g., ChatGPT Enterprise, Microsoft Teams Premium intelligent features, creative and generative tools such as Leonardo, Runway, Midjourney, HeyGen, and Adobe AI features) is in scope. Employees and contractors may only use these tools in approved, policy-compliant ways, ensuring any external AI use is subject to Lucid's governance and risk-management controls. All third-party tools are vetted and tested for data security, legal and regulatory compliance, and risk management before use. This ensures client contractual obligations are met, client data is protected, and Lucid remains aligned with international best practice and our ISO certification commitments.

3.3 Vendors and partners

Any vendor, supplier or partner that develops, provides or integrates AI systems into Lucid's operations or client deliverables must:

- Demonstrate alignment with Lucid's Responsible AI Guidelines
- Agree to contractual obligations that uphold Lucid's privacy, security, fairness and transparency requirements
- Promptly notify Lucid of any AI-related incidents, risks or material changes in their AI systems that could affect Lucid or its clients, in accordance with agreed reporting timelines and definitions set out in their contracts.

Lucid will share its Responsible AI Guidelines with all suppliers as part of the supplier onboarding process. Compliance with the guidelines will be a formal requirement under Lucid's Supplier Code of Conduct, ensuring that every partner upholds the same ethical and responsible AI standards we apply internally. Lucid retains the right to verify supplier compliance through audits or due-diligence reviews where appropriate. Vendors remain independently responsible for ensuring their own legal and regulatory compliance. Adherence to these commitments will be reviewed, and the Supplier Code of Conduct will be renewed or reaffirmed as part of the supplier renewal process.

3.4 Exceptions

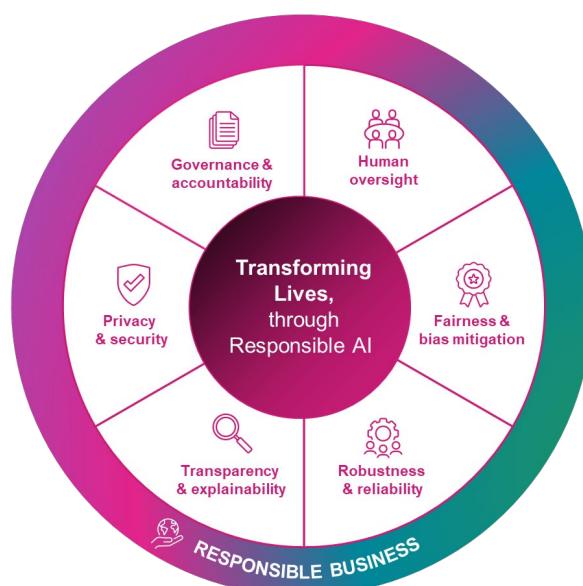
Exceptions to these guidelines cannot be made without documented approval from the relevant executive leadership in consultation with the Lucid Legal Team and Data Protection Officer (DPO).

All approved exceptions must be recorded, justified and retained in accordance with Lucid's governance and audit procedures, and no exception may override legal or regulatory obligations.

4. Responsible AI pillars

Lucid's responsible AI framework comprises seven pillars that establish the principles governing the development, deployment and use of AI. Each pillar is supported by defined practices that operationalise these principles throughout the AI lifecycle. Together, they ensure Lucid's AI use is aligned with our mission, values, legal and regulatory obligations, client obligations and international best practice.

Pillar	Definition
Governance and accountability	Establish robust governance, assign clear accountability, and ensure compliance with laws, standards and ethics.
Human oversight	Ensure meaningful human involvement at appropriate stages; AI should augment decision-making, not replace it.
Privacy and security	Protect data and privacy by using secure AI systems; comply with global data protection and security requirements.
Transparency and explainability	Make AI systems understandable and disclose their use to stakeholders.
Fairness and bias mitigation	Ensure AI systems are as fair, inclusive and free from unjust bias or discrimination as possible.
Robustness and reliability	Build AI systems that are technically robust, perform reliably and fail safely.
Responsible business	Minimise environmental impact of AI while embedding broader Responsible Business responsibilities.



4.1 Governance and accountability

AI at Lucid is governed with clarity and accountability; every project aligns with all applicable legal, regulatory and contractual obligations. Through transparent practices, with clearly defined leadership and roles, we take collective responsibility to ensure our AI use is trustworthy, and supports both Lucid and our clients responsibly.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">• Provides clarity on ownership and decision-making• Ensures compliance with applicable UK, EU, and US laws, as well as client contracts• Builds client and regulator confidence in our AI practices	<ul style="list-style-type: none">• Assign defined roles and responsibilities to every AI project• Maintain an AI inventory and classify risk for all use cases• Manage risks across the lifecycle with audits and compliance checks, retaining documentation to demonstrate adherence to governance standards• Apply continuous improvement using the Plan-Do-Check-Act cycle, with findings reviewed by Lucid Legal and responsible AI governance leads	<ul style="list-style-type: none">• Demonstrates Lucid's leadership in responsible AI• Builds credibility with clients and regulators• Positions Lucid for ISO 42001 certification in 2026

4.2 Human oversight

AI at Lucid is designed to empower people, not replace them. We keep human judgement, empathy and context at the centre of every decision, ensuring AI enhances our work, while remaining focused on what matters most. While we strengthen AI capability across our teams, we equally invest in developing the human and interpersonal skills that technology cannot replicate. We recognise that it is the collective power of our talent that truly transforms lives, empowered by AI, not replaced by it.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">• Keeps outcomes ethical and empathetic• Prevents blind reliance on AI outputs• Builds client trust in how we apply AI• Ensures AI is a tool to empower the work of our people, not replacing human ingenuity and creativity	<ul style="list-style-type: none">• Use human in the loop checks for critical outcomes consistent with applicable legal and regulatory oversight standards• Require pre-deployment and real-time human approvals• Train staff to interpret and question AI outputs• Maintain post-deployment feedback channels and retain oversight documentation for audit and compliance review• Invest in the technical and human skills of our people	<ul style="list-style-type: none">• Reassures clients that AI will always remain under appropriate human judgement and accountability• Builds trust by keeping people in control of high-impact outcomes• Strengthens Lucid's reputation for empathy and responsibility• Builds the collective capabilities of our talent

4.3 Privacy and security

Privacy and security are non-negotiable at Lucid. We design AI systems that protect the confidentiality, integrity and safety of data within our control, treating client information as our own and upholding trust through rigorous, responsible data stewardship.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">Ensures compliance with applicable data protection and privacy laws, including GDPR, the UK Data Protection Act 2018, CCPA, and equivalent frameworksMeets Lucid's contractual obligations with clientsPrevents harm from data misuse or breaches	<ul style="list-style-type: none">Apply privacy-by-design and minimise data useUse encryption, access controls and adversarial testingManage data through strong lifecycle governanceRespect data subject rights by ensuring mechanisms are in place to support access, correction, deletion, and objection requests in accordance with applicable data protection lawsMaintain AI-specific incident response playbooks and comply with legal and contractual breach notification requirements	<ul style="list-style-type: none">Provides clients with confidence that their data is consistently protected by industry-leading controlsReduces the risk of reputational or contractual breachesDifferentiates Lucid as a partner who treats data with the highest care

4.4 Transparency and explainability

At Lucid, we disclose when and how AI is used, ensuring our systems are transparent, explainable and open to scrutiny, so clients and colleagues can question, understand and learn with confidence.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">• Makes AI decisions visible and understandable• Enables stakeholders to question and challenge outcomes• Enhances credibility with clients and regulators	<ul style="list-style-type: none">• Disclose AI involvement in outputs and deliverables where its use materially influences outcomes or client deliverables, in line with legal and contractual transparency requirements• Use explainability tools and plain-language documentation (where technically and contractually feasible)• Keep audit trails and establish user feedback channels linked to Lucid's AI governance and compliance review processes	<ul style="list-style-type: none">• Builds trust through openness about AI use• Strengthens relationships by making complex systems understandable• Positions Lucid as a partner unafraid to 'open the black box'

4.5 Fairness and bias mitigation

Fairness is a cornerstone of responsible AI use at Lucid. We design and test our systems to be inclusive and representative, minimising bias and ensuring every AI-supported decision complies with applicable equality, non-discrimination and human-rights laws. We ensure every decision supported by AI upholds fairness and respect for all.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">Reduces the likelihood of harmful or discriminatory outcomesBuilds increased equity into how AI is usedReinforces Lucid's ESG and social responsibility commitments	<ul style="list-style-type: none">Use inclusive design and diverse inputBuild and test with representative datasetsRun bias detection and fairness audits on Lucid-developed or configured systems, where feasibleTrain teams to recognise and challenge bias in AIProvide channels for stakeholders to raise issues, overseen by Lucid Legal or the responsible AI governance leads	<ul style="list-style-type: none">Reinforces Lucid's commitment to fairness and respectEnhances credibility with clients seeking inclusive communicationsSupports ESG commitments by embedding fairness into outcomes

4.6 Robustness and reliability

AI at Lucid must be safe, resilient and dependable. We build systems that perform reliably, withstand misuse, and fail safely, so our clients and colleagues can trust AI to work as intended and solve meaningful problems with purpose.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">Ensures client confidence in Lucid's AI solutionsProtects against technical failures or misuseDemonstrates maturity in adopting advanced tools	<ul style="list-style-type: none">Run comprehensive testing (accuracy, stress, edge cases) in line with applicable AI safety and reliability standardsBuild safety mechanisms and resilience measuresMonitor, retrain and apply rollback proceduresDocument and resolve incidents effectively maintaining technical and version-control records for audit and compliance review	<ul style="list-style-type: none">Ensures clients can rely on Lucid's AI solutions with confidenceReduces risk of failure while enabling bold innovation

4.7 Responsible Business

We design and use AI in ways that align with Lucid's sustainability goals and relevant environmental and corporate reporting requirements – minimising environmental impact, measuring the GHG emissions of our AI use and embedding ethical and equitable practices throughout.

<i>Why it matters</i>	<i>How we apply it</i>	<i>Opportunities it provides</i>
<ul style="list-style-type: none">Reduces environmental and social impact of AIStrengthens credibility with clients and communities	<ul style="list-style-type: none">Track GHG emissions from usage using recognised standardsEnsure appropriate choice of AI tools based on environmental performance, efficiency and lifecycle impactPlan end-of-life for models and train teams on eco-responsibility with oversight through Lucid's ESG governance processes	<ul style="list-style-type: none">Reduces environmental impactStrengthens Lucid's Responsible Business credentials with clients and partners

5. Our ongoing commitment

5.1 Putting principles into practice

Responsible AI at Lucid is a living commitment. As technology, regulation, applicable legal requirements and client needs evolve, so will we. These guidelines will be reviewed annually by Lucid Legal and the responsible AI governance leads to stay relevant, resilient and aligned with Lucid's mission and values, and our clients' goals.

Every Lucid employee has a role in bringing responsible AI to life – using it with care, courageous curiosity, and inventing with intent.

For our clients and partners, these guidelines are a commitment of integrity and transparency. They show Lucid can be relied upon to safeguard data, meet commitments and use AI as a catalyst for meaningful, measurable change.

Looking ahead, embedding responsible AI across everything we do positions Lucid as leaders in the industry. Our aim of achieving ISO 42001 certification in 2026 reflects our ambition and our commitment to continuous improvement.

Responsible AI at Lucid is both a commitment and a promise, to our people, our clients, and to *Transforming Lives. Always.*

5.2 Let's talk

If you would like to learn more about how Lucid applies responsible AI in our work, or explore how we can support you as a **catalyst for change**, [please get in touch](#).