Funding Circle Holdings plc Responsible AI Statement

We have utilised forms of Artificial Intelligence (AI) for many years, developing our earliest machine learning models for proprietary credit modelling over a decade ago.

We are advocates for AI. We are building an AI-native business and believe AI will deliver transformative benefits for our people and customers we serve. As we embrace AI across our organisation to drive innovation and productivity, we recognise our responsibility to carefully manage the associated legal, regulatory, and ethical risks.

To help us maintain accountability, we have established the following Responsible AI Principles to govern how AI is used across our business.

1. **Human-centric & overseen**
   Embed meaningful human oversight into the design of all AI-augmented processes.

2. **Lawful, Ethical & Responsible**
   Deploy AI in a fair, transparent, and non-discriminatory manner, prohibiting the creation of harmful content, the use of synthetic media depicting an identifiable individual without their prior consent, and any use of synthetic media to impersonate or mislead.

3. **Secure & Confidential**
   Protect proprietary information, trade secrets, and our customers' confidential data by prohibiting its input into tools unapproved by Funding Circle.

4. **Transparent & explainable**
   Design AI-assisted outcomes to be explainable, ensuring we maintain the ability to articulate the factors, sources, or inputs that lead to or influence a given output.

5. **Compliant & Governed**
   Ensure all AI adoption adheres to applicable UK legislation and regulations, and establish a clear, lawful purpose before utilising any personal data for AI model training.

6. **Purpose-driven & proportionate**
   Deploy AI to advance our values and business strategy, and where any associated risks can be managed within our risk management framework.

7. **Skills, expertise & training**
   Provide the resources and training our people need to use AI responsibly and ambitiously, applying it to transform how we work and deliver better outcomes for Circlers and the businesses we serve. Encourage the internal sharing of best practice to build collective AI fluency.