

Waters Corporation Artificial Intelligence Workplace Policy

Effective Date: February 14, 2024

I. **INTRODUCTION AND PURPOSE**

Artificial Intelligence (or “AI”) tools, including generative AI and machine learning tools, may have the power to transform workplace efficiency, improve decision-making and creativity, and provide valuable insights into business operations. At the same time, the use of AI presents certain information security, intellectual property, and related challenges. Waters Corporation (collectively with its subsidiaries and affiliates, “Waters” or the “Company”) is committed to the highest standards of integrity and ethical business conduct with respect to the use of AI. Accordingly, the purpose of this *Artificial Intelligence Workplace Policy* (this “Policy”) is to ensure that Waters and its employees utilize AI tools in a lawful and ethical manner compliant that protects Waters’ confidential information and intellectual property interests.

This Policy is intended to supplement employee obligations under Waters’ existing policies, including but not limited to the: *Waters Confidential Information Policy*, *Global Code of Business Conduct and Ethics*, and the *Computer Policy*. This Policy applies to all employees and contractors when using AI tools; consequently, all Waters employees and contractors have the obligation and responsibility to adhere to this Policy.

II. **SCOPE**

In this Policy, publicly available, third-party applications driven by AI, such as chatbots (e.g., ChatGPT) or other content-generating tools, which are not specifically in-licensed or authorized by Waters for use on an enterprise-wide basis, are referred to herein as “Public GenAI”. Third-party AI tools that have been formally approved by, or licensed to, Waters through the input of relevant business stakeholders and the Legal Department are referred to herein as “Corporate GenAI”. This Policy provides the parameters by which Waters will determine whether to license or approve the use of Corporate GenAI, as well as the related parameters by which employees may use Public GenAI or Corporate GenAI for business use.

III. **EMPLOYEE USE OF PUBLIC GENERATIVE AI**

The following applies to employee use of Public GenAI:

- Employees must receive “informed approval” (as described below) from their direct supervisor before using any Public GenAI tool;
- Informed supervisor approval will apply on an individual use case basis, and such approval shall not grant open usage of the Public GenAI tool for other specific or general purposes;
- Employees must inform their supervisor or Waters’ Legal Department if they become aware of a change in the terms of use of a Public GenAI tool for which they have previously received informed supervisor approval and receive further informed approval before continuing use of the Public GenAI tool;
- Employees may only use a Public GenAI tool on their Company-provided hardware for business use;
- Employees are reminded that all Public GenAI Outputs (as defined below) must be independently verified;
- Company confidential information and third-party information (which is otherwise subject to confidentiality and nondisclosure obligations) may not be provided to any Public GenAI tool;
- Personally identifiable information of any kind, including for any Company employees, may not be

- entered into any Public GenAI tool;
- Employees may not integrate any Public GenAI tool with internal Company software or any Company products without supervisor and IT Department prior approval; and
- Employees may never use a Public GenAI tool in a manner that violates applicable law, including intellectual property and anti-discrimination laws.

IV. INFORMED APPROVAL

Any Waters employee requesting, recommending, or intending to use an AI tool to assist with Company business must first define the intended use case, including by identifying: (i) which AI tool or model the employee intends to use; (ii) the type and general substance of any information that may be provided by the employee to the AI tool, including any text prompts, images, training data, or other materials (“Inputs”); and (iii) the desired work product that the AI tool is being used to create (“Outputs”).

In the case of Public GenAI, such use case information must be provided to the relevant decisionmaker(s) and consent must be expressly given by the employee’s direct supervisor in accordance with the provisions of Section III, Employee Use of Public Generative AI, *before* the employee may use the proposed AI tool. Where there is a proposed enterprise use of Corporate GenAI, relevant stakeholders and approvers must be able to provide such use case information as part of the tool approval and onboarding process. Direct supervisor approval prior to use is not required once a tool becomes Corporate GenAI. Please direct any questions regarding informed approval to ethics@waters.com.

V. ADDITIONAL CONSIDERATIONS

In addition to the foregoing, any Waters employee required to approve the use of any AI tool must consider the following, as appropriate:

a. Confidentiality & Privacy

The use of AI tools must comply with all applicable data privacy rules and regulations, and any collection or input of data onto a platform may only be done so for a legitimate business purpose. All employees must adhere to the Company’s data privacy and security policies when using AI tools. Moreover, before inputting information onto a Public GenAI site or determining whether to license a Corporate GenAI tool, Waters and its employees must understand if and to what extent the tool will protect or safeguard the user’s information. *In no event should Company confidential information or third-party information in the Company’s possession that is subject to nondisclosure obligations be inputted onto a Public GenAI tool or website*, and the Legal Department must approve in advance any input of Company confidential information, trade secrets (e.g., schematics, source code, analytical data), or third-party information in the Company’s possession that is subject to nondisclosure obligations onto any Corporate GenAI tool.

b. Information Security

Before licensing a Corporate GenAI tool, Waters’ Information Security Department and Legal Department must be consulted and approve in advance. Among other things, tools and platforms should be configured securely, encryption and secure transmission should be employed wherever possible, and access to Corporate GenAI should be restricted to authorized personnel only consistent with approved business use.

c. Intellectual Property & Other Key Terms

The landscape surrounding the use of AI tools is evolving, and the terms of use of AI tools provide for varying user intellectual property rights (depending on the tool). Particular attention must be paid with respect to whether Waters would retain or would otherwise be deemed to out-license intellectual property rights, either to Inputs or Outputs, to the AI tool or other third parties. Accordingly, the Legal Department and other relevant business stakeholders must be consulted before the Company subscribes, uses, or licenses any Public GenAI or Corporate GenAI tool.

d. Human Oversight

Because AI tools are not free from error, Waters' employees must always exercise sound judgment when interpreting or utilizing AI-generated recommendations. AI tools should never replace human decision-making or analysis, but rather they should only be used to augment or facilitate such analysis. Employees must independently validate any Outputs and are prohibited from representing that any Output is their sole, original work.

e. Compliance with Laws & Ethics

In no event shall the use of Public GenAI or Corporate GenAI be used in contravention of applicable law or Company policies, including by generating content in a manner that violates intellectual property laws or anti-discrimination laws. AI tools may never be used exclusively in employment decisions, such as hiring, promotion, termination, performance evaluations, or discipline.

f. Risk of Error

AI tools are not free from error. When deciding whether to sanction the use of an AI tool, the relevant decisionmaker must consider whether any incomplete or incorrect Outputs could result in harm (e.g., to Waters and its brand, to a customer, or to a downstream consumer), and what the magnitude of that potential harm could be.

VI. OVERSIGHT & MONITORING

Waters may establish further procedures or review committees to implement this Policy and to review, approve, and monitor the use of Public GenAI or Corporate GenAI. The use of AI tools is subject to monitoring and oversight by the Company (including the IT, Compliance, HR, and Legal Departments) to ensure adherence to this Policy and applicable law. Violating this Policy may result in disciplinary action, up to and including termination. If you have any inquiries or comments regarding this Policy, or if you suspect that any person has violated this Policy, please contact ethics@waters.com.