

Responsible AI Policy

Template for Connective Brokers

Version: 1.0

Recommended by: Connective

Intended for: Self-employed brokers, brokerage directors and their teams

Policy type: First principles-based with practical guardrails

Review cycle: Annual or quarterly, as required due to regulatory or AI tool changes

1. Introduction

We use artificial intelligence (AI) tools to help us work more efficiently — from writing draft content and simplifying admin, to developing internal resources. But AI must be used responsibly.

This policy sets out how we will use AI in a way that protects our clients, supports our compliance obligations, and reflects our professional values. It applies to everyone working in the business, including brokers, support staff, contractors, and offshore teams.

2. Business information

Complete this section to contextualise the policy for your business.

- **Business name:**
- **Business website or email domain:**
- **Lending type:** ☐ Mortgage ☐ Commercial Property ☐ Asset Finance ☐ Mixed
- **Credit licence type:** ☐ ACL holder ☐ Credit representative (under Connective / other)
- **Team size:** ☐ Sole operator ☐ Small team (2–5) ☐ Medium team (6+)
- **Team location:** ☐ All onshore (Australia) ☐ Mix of onshore/offshore

Note: Team structure influences how and where AI risks such as data handling, security and access need to be managed.

3. Purpose of this policy

We work in a regulated, trust-based profession. Clients rely on us to protect their data and provide considered, human advice — not automated outputs.

This policy ensures:

- We protect client trust
- We meet our licence and legal obligations
- Everyone knows what's appropriate when using AI in our business

4. Guiding principles

We will use AI to support — not replace — our human judgement.

AI can be used to draft internal documents, marketing content or email outlines, but it will never replace the need for a broker to review and approve anything client or lender facing or compliance-related. We are always accountable for the final output.

We will not use AI to generate or automate regulated content.

We will not use AI to:

- Provide credit assistance
- Generate product comparisons
- Create credit proposal documents or preliminary assessments
- Interact directly with clients or lenders
- Pre-fill lender application forms
- Lodge or submit anything on behalf of a client

We will protect client confidentiality.

We will not enter identifiable client data (e.g. names, IDs, TFNs, payslips, application documents) into AI tools unless:

- The tool is business-grade, private, secure, and approved for that use, and
- The client has provided appropriate consent

We will redact or de-identify client data where possible.

We will ensure a human review before any AI-generated content is used externally.

We will not publish, send or share AI-generated content (e.g. on websites, social media, or email) without review and approval by a responsible team member.

We will not impersonate others using AI.

We will not use AI to mimic or represent other individuals (clients, colleagues, public figures) in writing, video or voice without explicit permission.

5. Shadow AI and unauthorised use

Shadow AI is the use of unapproved or unsanctioned AI tools by team members. This can lead to serious privacy and security risks.

To manage this, we will:

- Maintain a central list of approved AI tools and their use cases
- Require all team members to follow this policy, including offshore or remote teams
- Provide guidance and training to new starters
- Regularly review usage and outputs

6. Data, privacy and security

As a business operating in financial services, we commit to:

- **Not using personal AI accounts or unvetted tools** for business tasks
- **Avoiding tools that store data offshore** without appropriate controls
- **Protecting IP and sensitive business information**
- **Only using tools with secure user access and transparent data terms**

We will train offshore staff on how to follow these standards and restrict access where needed.

7. Client communication and transparency

We will not use AI to send automated messages to clients or to represent ourselves as a human without oversight.

Where AI has been used to help create a piece of content (such as an email draft or article), we will ensure:

- It has been reviewed by a real person
- It does not contain any client-specific data
- It does not mislead or imply automated advice

If AI is used in a client-visible way (e.g. chatbot, avatar, AI-generated video), we will inform clients clearly and ensure a human is responsible for oversight and approval.

8. Responsibilities

Brokerage owner / director / responsible manager will:

Approve which AI tools can be used

- Provide training on this policy
- Review AI usage annually or when systems change
- Take responsibility for any compliance or reputational risk arising from AI

All staff and contractors will:

- Read and follow this policy
- Only use approved tools
- Apply human-first judgment to all outputs
- Report any issues, misuse or concern immediately

9. Non-compliance

Using AI irresponsibly can put our business, clients and licence at risk.

Depending on the severity, misuse may result in:

- Tool access being removed
- Additional training being required
- Internal disciplinary action

- Reporting to regulators (if applicable)

10. Policy review and version history

This policy will be reviewed:

- At least once per year
- Whenever new AI tools are introduced
- If our business structure or team changes
- In response to any incident or risk event

We will maintain a version history and store this policy where all team members can access it.

Last reviewed: __ / __ / 202__

Next review due: / / 202

11. Acknowledgement

All team members (including offshore staff or contractors) must read and sign below.

[illegible]