

AI Literacy Policy (EU AI Act, Article 4)

Clausely (Golden Genesis UK)

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Accountable Person: Priscilla, Director, Golden Genesis UK

Effective Date: 21 May 2026

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1. PURPOSE AND LEGAL BASIS

1.1 This AI Literacy Policy establishes the framework by which Clausely (Golden Genesis UK) (the "Company") ensures appropriate competence, awareness, and literacy in artificial intelligence systems amongst its workforce.

1.2 The Company operates as a SaaS / Software. This policy is intended to ensure that all relevant personnel understand the capabilities, limitations, risks, and governance requirements associated with the AI systems used by the Company.

1.3 This policy is adopted in accordance with Article 4 of Regulation (EU) 2024/1689 (the EU Artificial Intelligence Act), which requires providers and deployers of AI systems to ensure that their staff and other persons dealing with the operation and use of AI systems on their behalf have a sufficient level of AI literacy.

1.4 Because the Company has declared EU exposure, this policy is also intended to support direct compliance with Article 4 of the EU AI Act by ensuring that personnel dealing with AI systems on the Company's behalf have a sufficient level of AI literacy appropriate to their role and the context of deployment.

1.5 Given the Company's current workforce size, AI literacy controls may be delivered through a lean governance model, provided responsibilities remain clearly allocated, training is documented, and use of AI systems remains subject to meaningful oversight.

2. SCOPE

2.1 This policy applies to all employees, contractors, temporary workers, consultants, agency personnel, and directors of Clausey (Golden Genesis UK) who, in the course of their duties, interact with, deploy, operate, monitor, review, or make decisions informed by AI systems used by the Company.

2.2 The AI systems currently in scope are:

2.2.1 ChatGPT / OpenAI — used for internal drafting, documentation, research assistance, and low-risk business productivity tasks.

2.2.2 Claude / Anthropic — used for drafting, analysis, summarisation, and approved workflow support subject to Company review controls.

2.2.3 AI in our product (customer-facing) — used only for the specific, documented business purpose approved by the Company.

2.3 This policy shall be reviewed and updated to reflect any changes to the AI systems deployed by the Company, the business functions in which those systems are used, or the legal requirements applicable to the Company.

2.4 For a smaller team, this policy may be implemented through direct manager-led instruction, short-form documented training, and centralised approval by the Accountable Person, provided completion and competence can still be evidenced.

3. DEFINITIONS

3.1 "AI system" means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

3.2 "AI literacy" means skills, knowledge, and understanding that allow providers, deployers, and affected persons to make informed decisions regarding AI systems and to comprehend the capabilities, limitations, and risks of AI systems.

3.3 "Deployer" means any natural or legal person, public authority, agency, or other body using an AI system under its authority except where the AI system is used in the course of a personal non-professional activity.

3.4 "Provider" means any natural or legal person, public authority, agency, or other body that develops an AI system or a general-purpose AI model or that has an AI system or a general-purpose AI model developed and places it on the market or puts the system into service under its own name or trademark, whether for payment or free of charge.

3.5 "Operator" means any person within the Company who directly interacts with or supervises the functioning of an AI system in the course of their role.

3.6 "Accountable Person" means the individual holding the role of Director, Golden Genesis UK, who is responsible for oversight of the Company's AI literacy and training arrangements unless and until that responsibility is formally reassigned in writing.

4. BASELINE AI LITERACY REQUIREMENTS

4.1 All staff members covered by clause 2.1 shall possess a baseline level of AI literacy appropriate to their role and the nature of their interaction with AI systems.

4.2 Baseline AI literacy shall include:

- (a) an understanding that AI systems operate on the basis of machine learning, pattern recognition, probabilistic inference, or statistical models, and do not possess human reasoning, consciousness, or judgement;
- (b) awareness of the general capabilities and intended uses of the AI systems deployed by the Company;
- (c) awareness of the inherent limitations of AI systems, including susceptibility to errors, hallucinations, bias, overconfidence, and dependence on training data quality;
- (d) recognition that AI-generated outputs require appropriate human verification and must not be accepted without scrutiny proportionate to the use case;
- (e) understanding of fundamental risks associated with AI systems, including data protection, confidentiality, discrimination, cybersecurity, intellectual property, and operational integrity risks; and
- (f) knowledge of the importance of responsible and lawful use of AI systems, including compliance with Company policies, customer commitments, and applicable legal obligations.

4.3 Staff shall be made aware that the level of review and caution required increases where AI output is used in customer-facing, regulated, legal, financial, employment, or other high-impact contexts.

4.4 In EU-facing contexts, baseline literacy must be sufficient not only for safe internal use but also to support lawful deployment, appropriate oversight, and any related transparency or governance obligations arising under the EU AI Act.

5. ROLE-SPECIFIC TRAINING REQUIREMENTS

5.1 In addition to baseline AI literacy, staff members whose roles involve the deployment, operation, monitoring, procurement, governance, or customer-facing use of AI systems shall undertake role-specific training commensurate with their responsibilities.

5.2 Deployers and Operators shall complete training covering:

- (a) a practical understanding of the AI systems in use, including input requirements, output characteristics, and operational constraints where known;
- (b) recognition and mitigation of known failure modes, edge cases, and error patterns relevant to the tools used by the Company;
- (c) application of review, validation, escalation, and quality assurance procedures for AI-generated outputs;
- (d) use of human oversight, including when and how to override, reject, or disregard AI-generated recommendations or content;
- (e) incident reporting procedures in the event of AI malfunction, misleading outputs, unintended consequences, or potential harm;
- (f) data protection and confidentiality obligations when entering business, personal, or sensitive information into AI systems; and
- (g) intellectual property considerations, including ownership, licensing, provenance, and infringement risk arising from AI-assisted work.

5.3 Senior Management and Oversight Personnel, including the Director, Golden Genesis UK, shall complete training covering:

- (a) governance frameworks and accountability structures for responsible AI deployment;

- (b) risk assessment methodologies for AI systems, including evaluation of potential harms to customers, staff, counterparties, and the public;
- (c) the regulatory landscape and compliance obligations under UK and EU law, including the EU AI Act, UK GDPR, and related governance expectations;
- (d) monitoring, audit, and reporting procedures to ensure ongoing compliance and identify emerging risks; and
- (e) documentation and record-keeping obligations relevant to AI governance.

5.4 Staff in customer-facing, commercial, compliance, or externally communicative roles shall receive training on:

- (a) transparent disclosure of AI involvement where disclosure is required by law, regulation, customer expectation, or Company policy;
- (b) managing stakeholder expectations regarding the reliability and limitations of AI-generated outputs; and
- (c) procedures for handling complaints, challenges, or concerns relating to AI-assisted outputs or decisions.

6. TRAINING CADENCE AND DELIVERY

6.1 Baseline AI literacy training shall be provided to all in-scope staff within thirty (30) days of their commencement of employment or engagement with the Company, or within thirty (30) days of this policy coming into effect for existing staff.

6.2 Role-specific training shall be completed within sixty (60) days of an individual assuming a role requiring such training.

6.3 Refresher training shall be provided annually to all staff subject to baseline AI literacy requirements.

6.4 Refresher training for role-specific requirements shall be provided at intervals not exceeding twelve (12) months, or more frequently where:

- (a) significant changes are made to the AI systems deployed by the Company;
- (b) new AI systems or materially different use cases are introduced;
- (c) regulatory guidance or legal requirements change; or
- (d) incidents, audits, complaints, or near-misses indicate gaps in competence or understanding.

6.5 Training may be delivered through face-to-face instruction, e-learning modules, webinars, workshops, scenario-based exercises, supervised practical exercises, or self-directed study supported by approved materials, subject to verification of completion and understanding.

6.6 All training materials and programmes shall be approved by the Director, Golden Genesis UK before deployment or use.

7. RECORD-KEEPING

7.1 The Company shall maintain accurate and up-to-date records of all AI literacy training provided to staff.

7.2 Training records shall include, as a minimum:

- (a) the name and job title of the individual trained;
- (b) the date or dates of training;
- (c) the type of training completed;
- (d) the relevant training content or curriculum reference;
- (e) the training provider or facilitator;
- (f) evidence of completion, attendance, or assessment outcome; and
- (g) the next scheduled refresher training date.

7.3 Training records shall be retained for a period of not less than six (6) years from the date of completion unless a longer period is required by law, regulation, insurance requirement, or internal governance rules.

7.4 Training records shall be subject to periodic audit by the Director, Golden Genesis UK or such other person as may be designated for that purpose.

7.5 Summary records of AI literacy completion rates, overdue training items, and identified competence gaps shall be reported internally on a periodic basis to support governance oversight.

8. ASSESSMENT AND COMPETENCE VERIFICATION

8.1 The Company shall implement mechanisms to verify that staff have attained and retained the requisite level of AI literacy.

8.2 Verification may include:

- (a) post-training assessments or quizzes;
- (b) practical competence demonstrations;
- (c) managerial observation and feedback;
- (d) review of work outputs and adherence to AI use protocols; and
- (e) periodic assurance checks targeted at higher-risk or customer-facing AI use.

8.3 Staff members who do not demonstrate satisfactory competence shall be provided with additional support, coaching, supervision, or repeat training as necessary.

8.4 Access to AI systems may be restricted, suspended, or withdrawn where an individual has not completed mandatory training or has not demonstrated adequate competence for the relevant use case.

9. ACCOUNTABILITY AND GOVERNANCE

9.1 Overall accountability for the implementation and enforcement of this policy rests with the Director, Golden Genesis UK (the "Accountable Person").

9.2 The Accountable Person shall:

- (a) ensure that appropriate AI literacy training is developed, procured, or commissioned;
- (b) monitor compliance with training requirements across the organisation;
- (c) review training effectiveness and identify opportunities for improvement;
- (d) report on AI literacy compliance to senior management, leadership, or the board as appropriate; and

(e) ensure this policy is reviewed and updated in accordance with clause 10.

9.3 Line managers and heads of department shall be responsible for:

- (a) identifying staff within their teams who require AI literacy training;
- (b) ensuring that such staff complete training within prescribed timescales;
- (c) monitoring adherence to responsible AI use practices; and
- (d) escalating non-compliance, repeated misuse, or competence concerns to the Accountable Person.

9.4 All staff have a personal responsibility to:

- (a) complete assigned AI literacy training in a timely manner;
- (b) apply the knowledge and skills acquired through training in their daily work;
- (c) raise concerns or uncertainties regarding AI system use with their line manager or the Accountable Person; and
- (d) report incidents, errors, unsafe outputs, or unexpected behaviour of AI systems in accordance with Company procedures.

10. POLICY REVIEW AND AMENDMENT

10.1 This policy shall be reviewed at intervals not exceeding twelve (12) months from the effective date, or sooner if:

- (a) there are material changes to the AI systems used by the Company;
- (b) relevant legislation, regulations, or regulatory guidance is updated or introduced;
- (c) internal audit, incident investigation, customer escalation, or other review reveals deficiencies in the policy or its implementation; or
- (d) there is any material change to the Company's EU-facing AI deployment, operating context, or Article 4 compliance obligations under the EU AI Act.

10.2 Any amendments to this policy shall be approved by the Director, Golden Genesis UK and communicated to all affected staff within a reasonable period following adoption.

10.3 A record of policy reviews and amendments shall be maintained by the Accountable Person.

This policy is effective from 21 May 2026 and should be reviewed annually or whenever relevant law changes. Signed: Director, Golden Genesis UK, Clausey (Golden Genesis UK).

Document Sign-Off

This document forms part of the Essentials Pack prepared for Clauseley (Golden Genesis UK). By signing below, the Accountable Person confirms that the document has been reviewed, approved, and is in force from the effective date.

Accountable Person: Priscilla, Director, Golden Genesis UK

Effective Date: 21 May 2026

Review Date: 21 May 2027

Signature: 

Date Signed: 22 May 2026

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