



Artificial Intelligence Policy Advisory Council (AIPAC) Charter

OVERVIEW

COUNCIL GOAL/MISSION: To develop and oversee the implementation of policies and guidelines related to artificial intelligence (AI) usage within BCBSMA.

COUNCIL PURPOSE: BCBSMA has leveraged AI capabilities for some time, and generative AI is a new, specialized form of AI that is garnering significant attention across industries given its potential to transform business operations. To address the risks and opportunities of AI for BCBSMA, the AI Policy Advisory Council is formed as part of the AI governance process. AI governance is mandated by the Blue Cross Blue Shield Association.

OPERATING GUIDELINES

EXECUTIVE SPONSOR(s): Dawn Perry, Chief Risk & Audit Officer

CHAIR(s): Jennifer Abdel-Samed, Chief Compliance & Privacy Officer

MEMBERSHIP: The AI Policy Advisory Council is comprised of a cross-functional team of legal, privacy, and security professionals who are appropriately skilled and empowered to established BCBSMA policies. At the minimum, the Council will include the following roles or their delegates: Chief Privacy Officer, Employment Lawyer, Legal Expert, Vice President of Enterprise Risk Management, Vice President of Government and Regulatory Affairs, Vice President of People Operations.

Voting Members		
Name	Title	Division
Jennifer Abdel-Samed	Chief Compliance & Privacy Officer (Chair)	Legal
Deborah Varao-Martin	Vice President, People Operations	People Team
Erika Wilkinson	Senior Director, Regulatory Affairs	Government & Regulatory Affairs
Joanneke Brentjens	Assistant General Counsel	Legal
Jennifer Stewart	Vice President, Enterprise Risk Management	Audit & Risk Management
Marc Freiburger	Associate General Counsel, Employment Law	Legal
Melissa Bradley-Horine	Vice President, Deputy General Counsel	Legal



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Non-Voting Members		
Name	Title	Division
Jeannie Cai	Analyst, Corporate Compliance (Secretary)	Legal

Membership will be reviewed and updated no less than annually by the Council Chair(s).

MEETINGS: The Chair will set the date, time, and location of Council meetings and will issue notices and agendas of meetings. The Council will meet monthly and may hold special meetings as necessary. A quorum will consist of a majority of the voting Council members. The Secretary is responsible for recording minutes of meetings.

The frequency of the meetings will be reviewed on a yearly basis. Council members are expected to attend all meetings but may be represented by an appropriate replacement in their absence.

RESPONSIBILITIES

OBJECTIVES: The Council will:

- Draft and update AI policies and ethical guidelines.
- Ensure compliance with relevant contracts, agreements, laws, and regulations.
- Oversee appropriate reporting to regulators.
- Ensure compliance with accepted BCBSMA policies, procedures and ethical standards.
- Provide advice and counsel to other AI governance groups as appropriate.
- Ensure AI governance groups and operational teams are appropriately trained and aware of BCBSMA policies regarding AI.
- Review AI project proposals from the AI Advancement Work Group for legal and ethical implications.
- Provide guidance on regulated best practices for AI development and deployment.
- Coordinate with the AI Risk Committee on policy matters related to risk management.
- Report new and updated policies and considerations.
- Ensure compliance with BCBSA AI Governance requirements.

DECISION-MAKING: Council will make decisions regarding updating of policies, procedures, and agreements to ensure continued compliance. Decisions are made based on unanimous agreement, with the Risk Committee serving as the ultimate decision-maker when consensus cannot be reached.

EXPECTED OUTCOMES: Outcomes include ensuring that BCBSMA provides comments to proposed regulations, provides interpretations of new regulations and reporting requirements, ensures that new requirements are captured in policies and procedures, and communicates new requirements for contractual language as applicable.



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The Council will use the following metrics to indicate progress towards the above outcomes:

- New and proposed regulations and guidance, including new reporting obligations.
- Policy updates or changes within the last 180 days, policy changes in consideration, and anticipated policy changes with the underpinning rationale.
- Updates to contractual agreements and timeline of actual completion.

REPORTING STRUCTURE OF COUNCIL: The Chair will provide reporting to the AI Governance Committee at least quarterly but as needed with consideration toward the time required for operational implementation of requirements.

CONFIDENTIALITY

In conducting its business, members of the Council will take special care, consistent with the Company's Code of Ethics and Conduct (the Blueprint) to protect the confidentiality of sensitive information it receives.

CONFLICTS OF INTEREST

Council members will promptly disclose any conflict of interest they may have with respect to any matter to be discussed by the Council.

POLICIES: The Council is responsible for oversight of policies as follows:

- Enterprise Artificial Intelligence Policy.

ANNUAL REVIEW: The Council Charter will be reviewed and updated annually, and when significant changes occur such as leadership changes, changes in focus to respond to revised corporate priorities, changes in reporting, changes in decision making authority and/or structure, and/or responding to external changes such as regulatory updates.

DOCUMENT INFORMATION

REVISION HISTORY:

Version	Date	Revision Summary
1.0	3/19/25	Creation

DOCUMENT OWNER:

Name	Organization
Jennifer Abdel-Samed	Legal

REVIEWERS: Voting Council Members