ARTIFICIAL INTELLIGENCE TRANSPARENCY STATEMENT

Last Modified: March 1, 2026

Castlight Health, Inc., including its affiliates and subsidiaries (collectively, "**Castlight**") and Vera Whole Health, Inc., including its affiliates and subsidiaries, as well as the Vera-friendly PCs, (collectively, "**Vera**") ("**it**," "**our**," "**us**," or "**we**") refers to the two (2) national healthcare delivery organizations providing digital healthcare navigation and clinical and advanced primary care services.

The following Artificial Intelligence Policy Statement (" **AI Transparency Statement**") covers the above-mentioned companies. Capitalized terms used and not otherwise defined in this AI Transparency Statement have the meanings given to those terms in our Privacy Policy or Terms of Use.

As a healthcare company, we are committed to making healthcare navigation easy and personalized. We use advancements curated by Artificial Intelligence ("**AI**") to support our services, inclusive of the Castlight digital experience accessible via web at https://us.castlighthealth.com and within the Castlight App on the App Store and/or Google Play; and Vera's advanced primary care clinic, accessible in our various care center state locations, via web at https://app.verawholehealth.com, and within the My Vera App on the App Store and/or Google Play (collectively "**Services**")[1].

Our Services are available to consumers through our employer, plan sponsor, and health plan customers who allow for their employee-sponsored benefit participants and their dependents (collectively, "**Eligible Members**" or "**members**") to engage with our services. We may use AI in a variety of ways to deliver efficient and personalized services, while guiding our members to the right resources, including human support via our Care Team, when appropriate.

This AI Transparency Statement outlines our policy for the use of AI within our Services, focusing on protecting member privacy, ensuring data security, and providing a positive, supportive member experience. In addition, our AI Governance Principals, as outlined below, follow applicable state laws, federal regulations and standards, as well as industry best practices ("**AI Regulations**").

I.   **Our Use of Artificial Intelligence.** We use various AI-driven tools to support a variety of employee benefits and health plan services. The Services that utilize AI-driven tools may include, but are not limited to the following:

   A.   **The Genius Tool** - Since 2015, we have used our Genius Tool – a predictive analysis Machine Learning ("**ML**") tool that analyzes the personal information, including health information (or "**PHI**") we receive externally (e.g., from your health plan or employer) or

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[1] Please note that while our **Services** are available to the Eligible Members of our customers, we may provide a white-labeled version of our services in a brand name approved by your health plan (different from the Castlight App or My Vera App). For specific links to your approved health plan provided benefits platform, please refer to your employer-sponsored provided materials.

internally (e.g., from details members provide directly to us), to identify if a member may be at a higher risk of developing a specific health condition(s). The Genius Tool arms members with personalized care and preventative recommendations to address current and potential future health risks, and, to the extent applicable, prioritizes our Care Team coordination and outreach for eligible members. Our tool also supports members in understanding their current health conditions and provides recommendations for next steps and healthy actions.

B. **Provider Directory** - The Provider Directory is an intuitive AI and ML-powered service that helps Eligible Members search, compare, and select the appropriate healthcare provider based on their current needs. With a specialized approach to advanced filtering, we match members with an in-network provider and allow members to match providers based on their requirements (e.g., location, speciality, etc.).

C. **Navigation AI Assistant (Conversational AI Assistant)**- Eligible Members may use our enhanced conversational feature to quickly find benefits information (e.g., benefits exploration, schedule appointments, plan details, etc.). Clearly labeled as a AI tool, powered by AI, ML, and Natural Language Processing ("**NLP**"), this tool was developed to offer helpful prompts and suggestions to members, interpret natural member queries, offer simple answers, and redirect members to relevant app functionalities, as well as offer personalized recommendations after analyzing member interactions.

D. **Document Summarization** - Our AI-driven tooling enables us to search through customer PDF documents, provide relevant answers, and summarize key content (e.g., insurance plan details) for Eligible Members – making it easier for members to understand their benefits.

E. **Ambience Clinical AI** - With clinical dictation, Vera healthcare providers are able to provide efficiency in clinical settings by having patient visit notes auto-generated to reduce after hours charting. Only patient appointments that have explicit member consent will be recorded using the dictation tool.

F. **AI Agents -** As part of our comprehensive development, we have developed or will develop specific AI-driven tooling in the form of AI Agents that are designed to perform select self-service benefit programming tasks for our Eligible Members. Examples of the types of AI Agents that we currently or may implement include, but are not limited to:

1. **Provider Finder & Cost Estimator Agent:** Helps members locate in-network doctors, specialists, and hospitals based on criteria (e.g., location, specialty, etc.); provides quality information; and offers estimated costs for procedures.

2. **Benefits Details & Accumulators Agent** - Provides members with specific details about their health plan coverage (e.g., deductibles, out-of-pocket maximums, copayments, covered services); current progress towards these accumulators; and handles access to digital insurance cards and explanation of benefits.

3. **Care Scheduling Agent** - Assists members with self-scheduling appointments with providers, prioritizing their Care Team and next available slots.

4. **Personalized Next Best Action & Engagement Agent** - Proactively or reactively suggests personalized next steps for the member's health journey (i.e., clinical, self-care, financial, etc) and delivers these recommendations through various channels (e.g., within the Castlight app, emails, or displayed within the system for use by Care Team members for live conservations).

5. **Wellness Program & Rewards Agent** - Informs members about available wellness programs (e.g., fitness challenges, habit-building tools), helps them enroll, tracks progress, and manages rewards/incentives for engagement and healthy behaviors.

6. **Pharmacy Benefits Agent** - Assists members in understanding their prescription drug coverage, checking copays for specific medications, identifying generic alternatives, and potentially finding in-network pharmacies.

7. **HRA & Document Center Agent** - Helps members find, understand, and potentially complete Health Risk Assessments ("**HRAs**"), access other member-specific documents, or fill out necessary forms.

8. **Account & Authentication Support Agent** - Assists members with managing their communication preferences and personal and dependent information.

9. **Benefit Marketplace Agent** - Allows members to ask about member benefit programs relevant to their health care journey.

10. **Care Guide Agent** - Assists our Care Guides in aiding the user with requests that can't be done via self-service. Provides summaries of conversations that happened within the AI-driven tool to avoid rework and present the Care Guide with recommendations, etc.

11. **Ungated Experience Agent** - Assists the member with resetting their password, troubleshooting, etc. in order to get logged into their app. This specific experience is governed by a distinct set of FAQs and does not have any access to Personal Information relating to the member.

G. **Employee Productivity** - Our employees may use AI productivity assistants powered by Large Language Models ("**LLMs**") to develop code completion, code generation, natural language chat, and other attributes to power and provide our Services. While productivity assistants support our employees' ability to efficiently generate code, all code continues to follow our manual review controls related to code review, pen tests, and status and analytics checks by humans.

II. **Our AI Governance Principles for AI-Driven Tools.** We have established a set of guiding tenets for developing, deploying, and using AI-driven tools in an ethical, responsible, and effective manner. Our principals aim to minimize risks while maximizing the benefits of AI for our Eligible Members.

A. **Governance Structure.** We have established an AI Review Committee to oversee the development and implementation of AI-driven tools with multi-disciplinary stakeholders from Clinical, Compliance, Engineering, Legal, Privacy, Product, and Security teams. The AI Review Board conducts regular reviews of its AI-driven tools to ensure compliance with this AI Transparency Statement, including ensuring that this AI Transparency Statement is reviewed and updated no less than annually or when it is necessary to reflect changes in technology, member needs, and AI regulations.

B. **Privacy Best Practices.** We prioritize protecting our member's privacy. As such, we will only collect necessary Eligible Member Personal Information when providing our Services or training its AI tools and/or and our Care Team. As part of our control mitigation measures, we remove the collection of unnecessary personal attributes, maintain policies and procedures that reduce the risk of unauthorized access and/or disclosure of Personal Information, and ensure that anonymity is maintained when possible by removing, obfuscating, or reducing access to Personal Information, including PHI in accordance with our [Privacy Statement](#) and AI Regulations.

C. **Data Security.** In order to maintain the security, confidentiality, and integrity of Personal Information, including PHI collected, we maintain comprehensive information security controls such as role-based security, malware, data encryption (in-transit/at-rest), data retention controls, etc. All Personal Information processed using AI-driven tools remains within our secure environment to maximize security. While we utilize a secure, third-party cloud infrastructure, such as Google Cloud to process data, all Personal Information remains within our secure, private environment. Under no circumstances is customer information used to train publicly available AI models, including Gemini, and access to this data is governed by strict contractual agreements and security controls.

D. **Supplemental Mechanisms.** We utilize supplemental mechanisms to govern and restrict the usefulness of certain workflows within our AI-driven tools to ensure our tools remain responsible before deployment:

1. <u>Sentiment Analysis</u> – We utilize sentiment analysis AI to detect the emotional tone expressed in a member's query, classifying it as positive, negative, or neutral (e.g., member excitement or frustration).
2. <u>Custom Data Knowledge</u> – We use custom data AI to tailor responses to our member's specific benefit and care needs, rather than relying solely on generic or publicly available sources.
3. <u>Medical Intervention Procedures</u> – We employ specific medical intervention AI procedures to:

   a) Restrict an AI-driven tool's ability to provide medical advice and re-direct members to consult with our Care Team members for medical concerns; and

   b) Ensure our internal crisis protocol is followed if a member discloses information that requires immediate medical intervention (e.g., suicidal thoughts, abuse, or a medical emergency) and alerts the AI-driven tool to flag this information and alert our Care Team members or appropriate emergency resources immediately.

E. **Responsible AI Practices and Quality Management.** We utilize responsible AI practices to ensure that, throughout all uses of AI in our services, we mitigate against the potential for bias in our AI-driven tools. Where possible, we will exclude information that can lead to illegal, discriminatory, or harmful outcomes during claims preprocessing (e.g., by use of our Genius or Document Summarization AI-driven tools) and deploy fairness metrics such as equal opportunity to ensure equitable outcomes. On a regular basis, we will audit its AI-driven tools to ensure quality assurance and decision making does not legally adversely affect any Eligible Member. By this manner, human oversight continues to be a central cornerstone of our ability to comfortably use AI. Any legally significant decisions, which include input from an AI-driven tool, will be reviewed by our employees.

F. **Transparency and Trust.** Your trust is paramount to our success. We will continue to be transparent about how our AI-driven tools are used within our Services. For example, members will be informed prior to any interactions with an AI-driven tool, including AI agents (e.g., chatbot), and about how their Personal Information, including PHI, is being used.

G. **Continuous Improvement:** In light of our our Services, we will continuously monitor and evaluate our AI-driven tools by making regular improvements based on changes to AI Regulation, internal policies, monitoring (e.g., detecting and responding to threats or malicious attacks), inevitable malfunctions of our AI-driven tools (i.e., model

hallucinations"), member feedback, and performance data (i.e., key performance indicators such as member engagement, satisfaction, and task completion rates to determine value add) collected. In addition, we will continue to ensure accessibility compliance with Web Content Accessibility Guidelines ("WCAG") standards.

III.   **How To Contact Us.** This AI Transparency Statement is meant to inform you of our position and use of AI-driven tools. If you have questions or concerns regarding the specific sections of this policy, please contact us via email at legal@apree.health. Otherwise, for any member support-related requests, you may contact us in one of the following ways:

A.   **Email:** privacy@apreehealth.com
B.   **Phone:**
   1.   1-888-241-1407 (for My Vera)
   2.   1-888-722-0483 (for the Castlight Platform)
C.   **Mail:** 100 W Towne Ridge Pkwy, 2nd Floor,
             Sandy, UT 84070
             ATTN: Member Support