ARTIFICIAL INTELLIGENCE TRANSPARENCY STATEMENT

Last Modified: July 7, 2026

The following Artificial Intelligence Transparency Statement applies to: 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**"). To the extent applicable, this policy also applies to any health plan or employer branded entity company that is a customer of Castlight and/or Vera. Collectively, all entities are referred to throughout this policy as "**it**," "**our**," "**us**," or "**we**".

Capitalized terms used and not otherwise defined in this AI Transparency Statement have the meanings given to those terms in our Privacy Statement 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, the Castlight App on the App Store and/or Google Play; 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**").

Our Services are available to consumers through our employer, plan sponsor, and health plan customers who allow eligible employee-sponsored benefit participants and their dependents (collectively, "**Member(s)**"or "**you**") 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 optimal resources, including human support via our Care Team[1], when appropriate.

This AI Transparency Statement outlines our policy for the use of AI within our Services, focusing on protecting privacy, ensuring data security, and providing a positive, supportive user experience. In addition, our AI Governance Principals, as outlined below, adhere to 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 tools:

[1] As defined in the Terms of Use, Care Team means healthcare providers, such as physicians (i.e., doctors of medicine or osteopathy), nurse practitioners and registered nurses/nurse case managers, physician assistants, behavioral health clinicians, certified diabetes educators, registered dieticians, and certified health coaches; as well as non-licensed healthcare professionals such as non-clinical care guides. While you may receive support from a licensed healthcare provider in using our Services, initial human support likely begins with a member of our non-clinical Care Guide team. When communicating with a licensed professional, such licensed professionals will identify themselves as such.

A. **The Castlight Genius Engine** - Since 2015, we have used the Castlight Genius Engine – 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 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 Engine arms Members with personalized care and preventative recommendations to address current and potential health risks, and, to the extent applicable, prioritizes our Care Team coordination and outreach to eligible Members. Our tool also supports Members in understanding their current health conditions and provides recommendations for next steps and healthy actions.

B. **Castlight Prism AI, Your Personal Health Assistant** - As part of our comprehensive development, select Members may use our self-service, conversational AI tool, to quickly explore benefit offerings such as appointment scheduling, prescription coverage, wellness programs, document summarization, and other plan-related offerings. Powered by Generative AI and Large Language Models ("**LLMs**"), this tool was developed to offer prompts and suggestions, analyze, and answer Member questions, and redirect Members to relevant in-app functionalities, as well as offer personalized recommendations after analyzing Member interactions. For more information on how we have developed and deployed Prism within our platform, please review our AI Whitepaper: PRISM.

C. **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[2], we match Members with an in-network provider and allow Members to match providers based on their requirements (e.g., location, speciality, etc.).

D. **Clinical Dictation** - At Vera clinics, we use dictation technology to help our providers focus more on you and less on paperwork. Providers utilize clinical dictation to streamline workflows and auto-generate visit notes. Only patient appointments that have explicit Member consent will be recorded using the dictation tool.

E. **Employee Productivity** - Internally, our employees may use AI productivity assistants powered by 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 – human or AI-generated – adheres to our secure software development lifecycle ("**SDLC**") controls

[2] We use advanced filtering in our provider directory to give members more precise results that go beyond the initial search. Here, we are able to pinpoint specific healthcare providers using granular criteria based on geography, speciality, and other custom fields.

including code review, static and dynamic security testing, unit and integration testing, and third party penetration testing.

II. Our AI Governance Principles for AI-Driven Tools

To fully embrace our use of AI and harness its benefits, we have established a robust set of governance principles for developing, deploying, monitoring our AI-driven tools in an ethical, responsible, and effective manner. Our principals aim to minimize risks, bias, misuse and security incidents, while maximizing the benefits of AI for our Members. By balancing AI transformation with governance, we believe we can confidently leverage our AI in a way to create a more equitable healthcare Member experience.

A. **Governance Structure.** We have established an AI Governance Committee to oversee the development and implementation of AI-driven tools. Our committee includes multi-disciplinary stakeholders from Clinical, Compliance, Engineering, Legal, Privacy, Product, and Security teams. The committee conducts regular reviews of its AI-driven tools to ensure compliance with this AI Transparency Statement, including ensuring that this 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 Member privacy. As such, we will only collect necessary Member Personal Information when providing our Services. As part of our mitigation control 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 strive to ensure that anonymity is maintained 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 preserve the security, confidentiality, and integrity of Personal Information, including PHI collected, we maintain comprehensive information security controls such as role-based security, threat detection and response, data encryption (in-transit/at-rest), data retention controls, etc. While we utilize a secure, third-party cloud infrastructure, such as Google Cloud to process data, Personal Information remains within our shared trust boundary. Customer information is **not** used to train publicly available AI models, including Gemini. Access to this data is governed by strict contractual agreements with our customers and internal data retention and security controls. For more information on how we have developed and deployed AI within our platform review our AI Whitepaper: PRISM.

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. Sentiment Analysis – 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. Custom Data Knowledge – 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. Medical Intervention Procedures – 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 the use of AI in our Services is managed by mitigating against the potential for bias in our AI-driven tools.

1. **Equitable Outcomes.** Where possible, we will exclude information that can lead to illegal, discriminatory, or harmful outcomes during the processing of Member Data (e.g., use of the Genius or Prism tools) and deploy fairness metrics such as equal opportunity to ensure equitable outcomes.

2. **Audits.** On a regular basis, we audit our AI-driven tools to ensure quality assurance and our decision-making does not adversely affect any Member.

3. **Human Oversight.** Consequently, human oversight remains a cornerstone of our strategy to ensure the secure, reliable adoption of AI. For example, where automated recommendations, involving outputs from AI-driven tools, are presented to Members (e.g., personalized recommendations for health-related conditions), we implement regular employee managed maintenance checks to ensure recommendations are accurate based on the information the AI-driven tool receives from the Member.

F. **Transparency and Trust.** Your trust is paramount to our success. We pledge to continue to be transparent about how our AI-driven tools are used within our Services. For example, Members will be informed prior to interactions with our AI-driven tools (i.e.,

the Genius Engine, Prism, and Clinical Dictation), and in some cases we will request your explicit consent. Moreover, we may monitor conversations (i.e., inputs generated by Members within our AI-driven tools) to ensure the quality and accuracy of responses within our Services.

G. **Continuous Improvement:** In light of our our Services, we will continuously monitor and evaluate our AI-driven tools to ensure we:

1. Make regular improvements based on changes to AI Regulations, internal policies and Member feedback;
2. Monitor our AI-driven tools to detect and respond to threats, malicious attacks and inevitable malfunctions;
3. Review performance data, such as, key performance indicators involving engagement, satisfaction, and task completion rates to determine value add.
4. Ensure accessibility for all Members, in 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 statement, please contact us via email at legal@castlighthealth.com. Otherwise, for any Member support-related requests, you may contact us in one of the following ways:

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

Version Publication History # ("VPH")

- Effective Date - August 15, 2025 - original draft
- **VPH #1 - April 1, 2026** - removes apree by name, specifies Castlight and Vera; clarifies our use of Prism as an internal AI tool
- **VPH#2 - July 7, 2026** - Clarified notes to specify applicable entities including Castlight and Vera customers.