



Artificial Intelligence Notice

Whether you are a candidate for employment or an employee, Ace Hardware Corporation (the “Company”) may use artificial intelligence-enabled tools, including automated or algorithmic systems, in connection with certain employment-related assessments or evaluations. These tools may be used for purposes such as recruitment, screening, hiring, promotion, discipline, performance evaluation, or selection for training or advancement, as permitted by law.

Nature of the Artificial Intelligence (AI) Systems Used

The Company may use one or more AI-enabled systems which may include computational processes that use generative AI, machine learning, statistical modeling, or data analytics that may be a factor in making employment-related decisions.

Where applicable, the AI system(s) may include:

- Product or System Name: Microsoft Copilot
Vendor: Microsoft
- Product or System Name: Chatbot
Vendor: Paradox Workday
- Product or System Name: Microsoft Copilot
Vendor: Korn Ferry
- Product or System Name: Microsoft Copilot
Vendor: First Advantage Corporation; Sterling Infosystems, Inc.
- Product or System Name: Dash Camera
Vendor: Samsara
- Product or System Name: OpenAI/ChatGPT
Vendor: LinkedIn Corporation
- Product or System Name: Financial Management; Human Capital Management; Talent Management; Payroll
Vendor: Workday

These tools are intended to assist, and not replace, human decision-making and are used as one factor among others in employment decisions.

Employee use of AI-enabled systems is subject to Ace’s Generative Artificial Intelligence Policy.

Employment Decisions and Job-Related Criteria Assessed

AI-enabled tools may assist in evaluating job-related qualifications, characteristics, or actions, which may include:

- Skills, experience, education, and work history
- Training, certifications, or licenses
- Job-related competencies or performance indicators
- Job-related screening questions or assessments
- Workplace investigations
- Other lawful, job-related criteria relevant to the position



The AI system(s) may be used in connection with all positions at the Company.

Data Collected and Sources of Data

In connection with the use of AI-enabled systems, the Company may collect, use, or process job-related information, which may include:

- Information provided directly or indirectly by candidates or employees, such as resumes, applications, employment history, education, skills, or qualifications
- Responses to screening questions, assessments, or interviews, including written or recorded responses where applicable
- Communications between candidates or employees and automated tools, such as chatbots
- Other employment-related information permitted by law

The data used by these systems may be obtained from:

- Candidates or employees directly
- Application or employment records
- External publicly available information
- Third-party service providers engaged to support employment-related processes, where permitted by law

Data Retention

Information collected or processed in connection with AI-enabled employment tools is retained only for as long as reasonably necessary to support employment-related decisions or to comply with applicable legal, regulatory, or recordkeeping obligations, and is subject to the Company's records retention and information governance practices.

Requests for Additional Information, Alternatives, or Accommodations

Candidates and employees may request the following related to the Company's use of AI in employment decisions where required by applicable law:

- Request information regarding the type of data collected, the source of such data, and the Company's data retention practices related to AI-enabled tools
- Request an alternative process
- Request a reasonable accommodation

Requests or questions may be directed to: HRCompliance@acehardware.com

If a written request for information is received, the Company will respond within the timeframe required by applicable law.

Limits on Disclosure

In certain circumstances, the Company may be unable to disclose specific information, including if doing so would violate federal, state, or local law or interfere with a law enforcement investigation.

Illinois-Specific Notice and Statutory Disclosure

Illinois law provides the following regarding the use of artificial intelligence in employment decisions:

"775 ILCS 5/2-102(L) – Use of Artificial Intelligence

(1) With respect to recruitment, hiring, promotion, renewal of employment, selection for training or apprenticeship, discharge, discipline, tenure, or the terms, privileges, or conditions of employment, it is a violation for an employer to use artificial intelligence that has the effect of subjecting employees to discrimination on the basis of protected classes under this Article or to use zip codes as a proxy for protected classes under this Article.



(2) It is a violation for an employer to fail to provide notice to an employee that the employer is using artificial intelligence for the purposes described in paragraph (1). The Department shall adopt any rules necessary for the implementation and enforcement of this subdivision, including rules governing the circumstances requiring notice, the timing of notice, and the means of providing notice.”

Governance

- This Notice is subject to interpretation and modification. The Company reserves the right to amend this Notice at any time.
- The Company will administer this Notice in compliance with applicable laws. To the extent there is a conflict between this Notice and applicable law, the applicable law will override this Notice.
- This Notice should not be interpreted to restrict or interfere with any individual’s rights under federal, state, or local law.

Effective Date: 1/1/2026