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GEN AI Overview

Tools that use generative artificial intelligence (GenAI) are now widely adopted to speed up the creation of original video, audio, text, and image content across all stages of media production. At GEM, these technologies are viewed as innovative assistants—helpful when used openly and with care.

This guidance is designed to inform filmmakers, partners, and vendors about responsible GenAI use on GEM projects. Inside, you'll also find a practical resource for evaluating when and how GenAI can be safely and confidently used during content creation for GEM.

To maintain high standards in global productions, GEM asks that any planned use of GenAI tools be discussed with your GEM representative, since new tools often come with unique risks and capabilities.

In most simple, low-risk scenarios—provided you stick to the principles outlined below—no special legal review is needed. But if your GenAI output will be a final deliverable, uses any individual's likeness, includes personal or private data, or draws from IP owned by others, you must get a written sign-off from GEM first.

Table of Contents

- Guiding Principles
- Usage Scenarios Always Requiring Approval
 1. Data Use
 2. Creative Output
 3. Talent & Performance
 4. Ethics & Representation
- How to Protect Data and Confidentiality
- Considering Final vs. Temporary Media
- GenAI Use for Enhancing Talent
- Custom GenAI Workflows and Vendor Use
- Appendix: Use Case Matrix

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GEM Guiding Principles

Because these tools are new—and the legal rules are still evolving—it’s vital to act thoughtfully when leveraging AI for content creation. GEM asks all partners to keep these principles in mind before using GenAI in any creative workflow:

- Outputs should not copy, closely mimic, or otherwise use recognizable features from material that GEM does not own or have permission to use.
- Chosen GenAI solutions must not store, reuse, or further train on GEM’s inputs or project data.
- GenAI technologies should be deployed in an enterprise-secure environment whenever possible, to protect sensitive content.
- Temporary GenAI content should not be included in final deliverables unless approved.
- GenAI must not be used to create or replace recorded performances, especially for union-covered roles, unless proper permissions are in place.

If you can agree “yes” to each principle, share your intended approach with GEM for awareness. If any answer is “no” or “not sure,” pause and escalate for guidance and formal approval before proceeding. This applies equally to custom GenAI pipelines involving multiple tools or vendors.

Scenarios That Always Need Written Approval

Some uses of GenAI are higher-risk and always require escalation:

1. Handling of Sensitive Data

You must protect private and creative information. Do not input GEM’s unreleased media, scripts, photos, or personal information about cast/crew into GenAI tools unless

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officially cleared. Never use materials from third parties or unlicensed sources to train or refine AI without explicit legal approval.

2. Creative Content Creation

If GenAI is used for story-critical assets, lead characters, significant scenes, or main fictional worlds—written permission is always required. Avoid referencing or using copyrighted people or works in prompts without the right approvals.

3. Talent and Performances

GenAI should never be used to make digital likenesses or voices representing real people without their documented consent and adherence to relevant guild requirements. Take special care before digitally altering or enhancing talent, especially when making changes that might alter performance intent or meaning.

4. Ethical Standards and Representation

GenAI must not be used to produce content that misleads viewers or is easily mistaken for real events or statements. Ensure it does not undermine or take the place of duties typically carried out by unionized or contracted workers unless specifically agreed.

Data Security & Confidentiality

Whenever possible, use GEM-approved enterprise-grade AI tools, which offer enhanced protection for any inputs. Discuss available secure solutions and onboarding steps with your GEM contact. These approved tools help:

- Prevent reuse, training, or sale of your inputs
- Safeguard confidential assets and visuals

If not using official, enterprise-level tools, make sure any GenAI solution is configured not to store or train on your project's data. Always check licensing terms and ask GEM if anything is unclear.

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Final Deliverable vs. Temporary GenAI Output

All GenAI-generated pieces that will appear in a finished GEM product—including minor visual, text, or audio details—require more scrutiny around legal and ethical implications. If these will be visible or audible in the final work, notify GEM early in the process for clearance guidance.

For creative brainstorming or placeholder concepts, GenAI can be freely used, but the final version must include sufficient human creative oversight and comply with legal protocols.

Talent Enhancement with GenAI

When using GenAI to enhance an actor’s likeness or voice, new legal and ethical questions arise. Always get proper consent for creating ‘Digital Replicas’ and for any major modifications. Minor enhancements—like those made routinely in post, such as noise reduction or cosmetic adjustments—generally do not require extra permissions.

Models and AI outputs created for a specific production must not be reused on other projects or for marketing without explicit, additional agreements. Always conduct quality checks early on and involve talent as needed to verify accuracy and respect their dignity and reputation.

Vendor and Custom Workflow Considerations

If a vendor you engage uses a custom GenAI workflow, it must meet all GEM standards for consent, data security, and content integrity described here. As a production lead, use these guidelines to review any outside partners’ approaches and consult GEM if uncertain.

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This policy ensures GEM collaborates with partners to use AI responsibly, with an emphasis on transparency, respect for rights, and the protection of creative, personal, and proprietary material.