

Responsible Artificial Intelligence Program

Purpose and Scope of Application

To support the Company's Responsible Artificial Intelligence Governance Policy Statement and promote the responsible application of artificial intelligence (AI) across engineering services and corporate operations, the Company has developed this Program as a framework for advancing AI governance, risk management, and sustainable practices.

This Program aims to promote AI applications that align with the principles of transparency, trustworthiness, safety, sustainability, and human-centeredness, and to serve as a reference for the Company in further enhancing its AI governance mechanisms, risk management measures, and sustainable development practices.

The scope of this Program covers activities related to the development, adoption, procurement, use, operation and maintenance, and management of AI technologies within the Company. The Company will adopt flexible and proportionate management measures based on the risk level of the application scenario, technological maturity, and operational needs.

AI Ethics and Safety Training

The Company continues to promote AI education, training, and awareness through diverse learning channels, including in-person training, seminars, workshops, and CTCI University, to enhance employees' awareness and capabilities in AI technology applications, ethics, security, risk management, and responsible use.

In 2025, the Group Research and Innovation Center conducted 12 in-person AI training sessions in total, with a cumulative attendance of 724. To further expand the reach of education and training and improve learning accessibility, the Company has also continued to convert relevant courses into digital formats and make them available through CTCI University, providing employees with more flexible learning options. Prior to the initial release of this Program, relevant digital AI courses had accumulated more than 3,000 views. Going forward, the Company will continue to update and enrich relevant training content in response to developments in AI technology, regulatory trends, and practical needs, covering topics such as AI literacy, AI tools and applications, AI ethics and governance, risk management, information security, data privacy, and data protection.

Relevant training records and statistical data may serve as a basis for the Company's efforts to enhance AI literacy and track effectiveness. In accordance with the Company's sustainability information disclosure plans, such information may also be included in sustainability reports or other external disclosure materials to demonstrate the Company's achievements in promoting responsible AI applications and talent development.

Access Restrictions and Authorization Controls for Sensitive AI Capabilities

The Company places great importance on protecting confidential business information, personal data, customer information, project data, and other sensitive information. AI applications involving sensitive data or critical business processes, such as facial recognition, surveillance systems, or biometric applications, shall follow the Company's existing information security and access management principles, with strict access controls and usage restrictions implemented accordingly.

The use of relevant AI capabilities shall be subject to appropriate access controls, authorization management, or other protective measures based on the nature of the data, intended purpose, business needs, and level of risk, in order to reduce the risks of data leakage, unauthorized use, misuse, or other potential information security risks. As AI applications continue to evolve, the Company will also continue to review the appropriateness of these management measures to support a safe and trustworthy AI environment.

AI Model Fairness and Bias Assessment

The Company places importance on potential bias, disparate impacts, and fairness risks arising from AI applications. When adopting, procuring, using, independently developing, training, or fine-tuning AI models and related services, the Company shall take fairness, bias risks, and ethical impacts into overall consideration based on the application context, data characteristics, intended users, and the potential scope of impact.

For application scenarios involving external AI models, such as AI models provided by companies including Google and OpenAI, the Company may, based on practical needs, review technical documentation, safety reports, risk information, or other relevant materials provided by the providers, and conduct an evaluation of their potential impacts on different groups to the extent reasonably practicable. If inappropriate bias or fairness concerns are identified, the Company shall take corresponding corrective measures, such as replacing the provider or restricting use, in order to maintain fair, inclusive, and trustworthy AI applications.

For models independently developed, trained, or fine-tuned by the Company, the Company shall review the sources, representativeness, and quality of the data, and conduct necessary bias and fairness management based on the intended purpose, level of impact, and degree of risk of the model. Relevant models shall be assessed once a year. Depending on actual needs, the assessment may include audits, bias testing, and fairness evaluations, to verify that the models do not result in unreasonable bias or disparities among different groups. If unreasonable bias or disparities are identified in model outputs, the Company shall take appropriate corrective measures, including data adjustments, model modifications, restrictions on use, or other appropriate measures, in order to maintain fair, inclusive, and trustworthy AI applications.

AI Model Drift Correction Mechanism

The Company recognizes that, during the practical application of AI models or AI services, model version updates, data drift, or changes in the external application environment may result in degraded output quality, differences in applicability, or abnormal results. For important AI applications, the Company shall establish appropriate monitoring, user feedback, or anomaly reporting mechanisms and, as a general principle, conduct a review once a year. However, the frequency and method of review may be adjusted based on application risks, frequency of use, degree of business impact, model or service version updates, and actual management needs, in order to detect model drift or performance degradation.

When the output quality, stability, or applicability of an AI application is found to deviate from expectations, the relevant units may take necessary measures, including conducting reviews, adjusting prompt engineering approaches, providing usage reminders, restricting use, adjusting the manner of application, updating service settings, reporting issues to and collaborating with technology providers to implement corrections, or taking other appropriate measures, in order to ensure the reliability and accuracy of AI applications. As AI technologies continue to evolve and application experience accumulates, the Company will gradually strengthen its capabilities for monitoring, feedback, and improvement.

Transparency Disclosure and Labeling Mechanism for AI-Generated Content

The Company places importance on the transparency of content generated or assisted by AI. For AI systems, AI services, or AI-assisted functions provided or adopted by the Company, clear labeling, explanations, or disclosures shall be provided as appropriate based on the application context, target users, and intended use of the content. Such labeling and explanations shall enable users or stakeholders to understand that the content is generated, organized, or provided as analytical recommendations by AI, so that they can recognize the nature and limitations of such content and make informed judgments and choices.

The disclosure of AI-generated or AI-assisted content shall adopt proportionate approaches based on the application context, target users, intended use of the content, and the degree of potential impact, in order to maintain the clarity, professionalism, and trustworthiness of information communicated.

Appeals Process and Protection of User Rights

The Company recognizes the potential impact of AI applications on users, customers, business partners, and other stakeholders. For AI services provided or adopted by the Company, appropriate responsible units and points of contact shall be designated based on the nature of the service, target users, and degree of impact. Where appropriate, contact information shall also be provided through relevant webpages, system interfaces, or other suitable channels, enabling relevant individuals or stakeholders to submit feedback or appeals regarding AI application outcomes, usage, or related concerns.

For feedback or appeals related to the Company's AI applications, employees may raise their concerns through

the employee feedback platform or directly contact the relevant responsible unit. Where customers, providers, or other external stakeholders are affected, the affected parties may submit appeals through the Company's external contact email (ctcigrp@ctci.com), CTCI Whistleblowing Website, or by contacting the relevant business unit.

CTCI Whistleblowing Website: <https://secure.conductwatch.com/ctci/?Pg=1&Lang=en-US>

Such cases shall be centrally received and coordinated by the Group Research and Innovation Center, and shall be referred to the appropriate responsible unit for careful handling based on the nature of the case, degree of impact, and existing management mechanisms. Where necessary, cases may be submitted to the Information Security Promotion Committee for review and decision.

Where necessary, subsequent reviews or improvements may be carried out in accordance with the Company's internal policies, contractual arrangements, or applicable legal and regulatory requirements, in order to protect stakeholder rights and interests, safeguard the Company's reputation, and implement accountability mechanisms and social responsibility in the application of AI.

Ecological Footprint Initiatives

The Company recognizes that the development and application of AI technologies should take into account energy conservation and their ecological footprint. To the extent reasonably practicable, the Company will improve energy efficiency and reduce unnecessary computing and energy consumption.

When procuring or using external AI services, the Company will assess their suitability based on actual application needs and take into consideration providers' performance in sustainability-related areas, including energy conservation, ecological footprint, and net-zero efforts, in order to balance the benefits of AI applications with environmental sustainability.

Where AI computing resources are built or managed by the Company, priority will be given, to the extent reasonably practicable, to the use of more energy-efficient hardware. Currently, the Company's own AI computing resources are located within its headquarters buildings. The associated electricity consumption forms part of the Company's overall energy use and is covered by the Company's existing energy management and carbon reduction management, such as the use of high-efficiency air-conditioning systems in IT server rooms. The Company has established science-based carbon reduction targets that have been validated by the Science Based Targets initiative (SBTi) and has implemented the ISO 50001 Energy Management System to continuously promote energy efficiency and carbon reduction management.

During model development, training, and application, the Company will also reduce unnecessary computing and energy consumption through appropriate model selection, model compression or quantization, algorithm optimization, and other suitable approaches.

Quantification of Sustainability Impact

The Company recognizes the potential contributions of AI technologies to operational efficiency, the quality of engineering services, and sustainable development goals. In promoting AI applications, the Company will continue to explore the impacts of AI adoption on areas such as operational efficiency, resource utilization, energy management, risk reduction, and enhancement of service value, taking into account the application scenario, data availability, technological maturity, and the feasibility of measurement methods.

For AI applications with clearly defined use cases and a measurable basis, the Company may, to the extent reasonably practicable, establish quantitative indicators (KPIs), such as carbon emissions, energy consumption, resource savings, or risk reduction, to evaluate the actual benefits following implementation. The relevant quantitative results will serve as a reference for the subsequent optimization of AI strategies and may, depending on practical needs and disclosure plans, be presented in sustainability reports or other appropriate external disclosure documents, using a data-driven approach to demonstrate the positive environmental and social value of AI applications.