

天工国际有限公司
负责任人工智能使用政策
Tiangong International Company Limited
Responsible Usage of Artificial Intelligence Policy

第一章 总则

Chapter One. General Provisions

第一条 天工国际有限公司（以下简称“公司”）为规范人工智能（以下简称 AI）技术的研发与应用活动，保障相关活动合规、安全、合乎伦理地开展，守护各方合法权益，推动 AI 技术负责任发展，结合运营实际，制定本政策。

Article 1 Tiangong International Company Limited (hereinafter referred to as "the Company") formulates this Policy to regulate the research and development and application activities of artificial intelligence (hereinafter referred to as AI) technology, ensure that relevant activities are carried out in a compliant, safe, and ethical manner, protect the legitimate rights and interests of all parties, promote the responsible development of AI technology, and in light of the actual operations.

第二章 适用范围

Chapter Two. Scope of Application

第二条 本政策适用于天工国际有限公司及其合并报表范围内的所有实体（以下统称“本集团”）相关活动全流程。同时，本集团要求承包商、供应商、中间人、代理商、合作伙伴及其他商业伙伴在其运营中尊重负责任 AI 使用原则。

Article 2 This policy applies to the entire process of related activities of Tiangong International Company Limited and all entities within its consolidated financial statements (hereinafter collectively referred to as "the Group"). Meanwhile, the Group requires suppliers, distributors, contractors, and other partners to jointly comply with this policy.

第三章 负责任 AI 使用原则

Chapter Three. Principles of Responsible Usage of AI

第三条 数据隐私保护

本集团在人工智能开发与应用全流程中，严格遵守各管辖区域数据保护相关法律法规，始终将保障数据主体隐私权益放在核心位置。开展 AI 模型训练、AI 项目落地等工作时，严格遵循数据收集最小必要原则，对涉及个人信息的全类别数据严格落实合规授权流程与加密保护措施，坚决杜绝违规泄露、滥用数据信息行为。

Article 3 Data Privacy Protection

In the entire process of AI development and application, the Group strictly complies with data protection laws and regulations in each jurisdiction, always placing the protection of data subjects' privacy rights and interests at the core. When carrying out AI model training and AI project implementation, the Group strictly follows the principle of minimum necessity for data collection, implements compliant authorization procedures and encryption protection measures for all categories of data involving personal information, and resolutely prohibits illegal disclosure and abuse of data information.

第四条 网络安全防护

本集团将 AI 相关系统的网络安全纳入集团全域安全管理体系，在 AI 开发、部署、运行全生命周期开展常态化安全防护、漏洞排查与应急演练，持续迭代升级安全防护能力，防范 AI 系统被非法入侵、篡改、滥用，保障 AI 体系持续稳定安全运行。

Article 4 Network Security Protection

The Group integrates the network security of AI-related systems into the Group's comprehensive security management system, and conducts routine security protection, vulnerability investigation, and emergency drills throughout the entire life cycle of AI development, deployment, and operation, continuously iterating and upgrading security protection capabilities to prevent AI systems from being illegally intruded, tampered with, or abused, and ensure the continuous, stable, and safe operation of the AI system.

第五条 算法偏见防控

本集团严格防控 AI 开发与应用过程中的各类潜在偏见。用于 AI 模型训练

的数据集须经过合规性与公平性双重审核，在模型开发、迭代全阶段持续开展偏见检测与校正，避免 AI 决策因训练数据缺陷、算法设计偏差产生歧视性、不公平结果。

Article 5 Algorithm Bias Prevention and Control

The Group strictly prevents and controls various potential biases in the process of AI development and application. Datasets used for AI model training must undergo dual review for compliance and fairness, and bias detection and correction are continuously carried out throughout the entire stage of model development and iteration to avoid discriminatory or unfair results in AI decisions due to training data defects or algorithm design deviations.

第六条 人工监督与主导

本集团坚持在关键事项中保留必要的人工监督和干预机制。对于涉及重大经营决策、财务披露、合规判断、质量安全、法律事务及其他重要敏感事项，AI 生成的结果仅可作为辅助参考，不得替代人工专业判断和终决策。本集团可根据具体场景对 AI 系统运行、输出结果及应用过程进行人工审查、核查、修正、中止或停止使用。

Article 6 Human Supervision and Leadership

The Group insists on retaining necessary human supervision and intervention mechanisms in key matters. For matters involving major operational decisions, financial disclosure, compliance judgment, quality and safety, legal affairs, and other important sensitive matters, AI-generated results can only be used as auxiliary references and shall not replace human professional judgment and final decisions. The Group may conduct manual review, verification, correction, termination, or cessation of the use of AI system operation, output results, and application processes according to specific scenarios.

第七条 透明与可解释

本集团保证所开发、应用的 AI 系统具备完整可追溯性，对于 AI 输出结果与决策结论，本集团将按照监管要求与利益相关方合理需求，提供清晰可理解的解释，杜绝不透明的 AI 应用场景。

Article 7 Transparency and Explainability

The Group ensures that the AI systems developed and applied have

complete traceability. For AI output results and decision conclusions, the Group will provide clear and understandable explanations in accordance with regulatory requirements and reasonable needs of stakeholders, and eliminate opaque AI application scenarios.

第八条 明确责任归属

本集团针对 AI 模型与 AI 工具生成的全部输出结果，建立清晰的分层问责体系，明确不同场景下 AI 应用结果的责任主体，保障能够妥善处置 AI 应用可能产生的意外后果与损害事件。对违规使用 AI 或因管理不到位造成不良影响的，本集团将依照相关制度追究责任。

Article 8 Clear Allocation of Responsibilities

The Group establishes a clear hierarchical accountability system for all output results generated by AI models and AI tools, clarifies the responsible parties for AI application results in different scenarios, and ensures the ability to properly handle unexpected consequences and damage incidents that may arise from AI applications. For violations in usage of AI or adverse impacts due to inadequate management, the Group will pursue accountability in accordance with relevant systems.

第九条 划定 AI 活动清晰边界

本集团基于法律法规、伦理准则与业务合规要求，明确划定 AI 可开展与禁止开展的活动边界，所有 AI 开发、应用活动严格在合规边界内推进，绝不越界开展违规 AI 研发与应用。

Article 9 Defining Clear Boundaries for AI Activities

The Group clearly delineates the boundaries of permitted and prohibited AI activities based on legal regulations, ethical guidelines, and business compliance requirements. All AI development and application activities are strictly carried out within the compliance boundaries, and no unauthorized AI research and development or applications are conducted beyond the boundaries.

第十条 践行绿色低碳要求

本集团要求自有及合作第三方的 AI 数据中心、AI 模型落实低碳运营要求，通过技术优化、全流程能耗管理降低 AI 相关活动的生态足迹，包括能源使用、水资源使用和碳排放强度等，共同推动 AI 业务绿色低碳发展。

Article 10 Implementing Green and Low-Carbon Requirements

The Group requires its own and third-party cooperative AI data centers and AI models to implement low-carbon operational requirements, reducing the ecological footprint of AI-related activities through technological optimization and full-process energy consumption management, including energy use, water resource use, and carbon emission intensity, jointly promoting the green and low-carbon development of AI business.

第十一条 禁止违规 AI 应用

本集团禁止使用、部署或开发以下 AI 系统或应用：

- （一）通过操纵、诱导、欺骗等方式影响他人自主判断和行为的系统；
- （二）利用特定群体脆弱性实施剥削、误导或不当影响的系统；
- （三）用于社会评分、社会排序或基于不当标准实施差别对待的系统；
- （四）未经合法授权开展生物特征识别、面部识别监控或其他生物识别监视活动的系统；
- （五）违反法律法规、监管要求、伦理规范及公司制度的其他 AI 系统和应用。

Article 11 Prohibition of Non-Compliant AI Applications

The Group prohibits the use, deployment, or development of the following AI systems or applications:

- (1) Systems that influence others' autonomous judgment and behavior through manipulation, inducement, deception, or similar means;
- (2) Systems that exploit the vulnerabilities of specific groups to engage in exploitation, misleading, or undue influence;
- (3) Systems used for social scoring, social ranking, or differential treatment based on improper criteria;
- (4) Systems that carry out biometric identification, facial recognition surveillance, or other biometric monitoring activities without legal authorization;
- (5) Other AI systems and applications that violate laws, regulations, regulatory requirements, ethical norms, and company policies.

第四章 负责任 AI 使用关键实践

Chapter Four. Key Practices for Responsible Usage of AI

为切实履行上述原则，本集团承诺落实以下关键实践：

To effectively implement the above principles, the Group commits to the following key practices:

第十二条 治理和监督

本集团设立数据中心为所有 AI 项目提供正式监督与战略指导。数据中心定期召开会议，监督 AI 系统运行、评估风险，并确保符合适用的法律要求。决策采用基于风险的方法，重大事项将上报高级管理层及董事会。

Article 12 Governance and Supervision

The Group has established the Data Center to provide formal oversight and strategic guidance for all AI projects. The Data Center holds regular meetings to monitor AI system operations, assess risks, and ensure compliance with applicable legal requirements. Decisions adopt a risk-based approach, and major matters are escalated to senior management and the board of directors.

第十三条 敏感 AI 能力访问管控

本集团对具备人脸识别、行为监测等敏感属性的 AI 能力建立分级授权访问管控机制，仅向具备对应业务权限与合规资质的工作岗位开放访问权限，严格限定敏感 AI 能力的使用场景与范围，防范违规滥用风险。

Article 13 Access Control for Sensitive AI Capabilities

The Group establishes a tiered authorized access control mechanism for AI capabilities with sensitive attributes such as facial recognition and behavior monitoring. Access permissions are only granted to job positions with corresponding business authority and compliance qualifications, strictly limiting the usage scenarios and scope of sensitive AI capabilities to prevent the risk of unauthorized abuse.

第十四条 AI 生成内容与结果标注

本集团要求所有对外输出的 AI 生成内容，都必须添加清晰可识别的 AI 来源标注，明确区分人工产出内容/决策与 AI 产出内容/决策，保障信息透明，不对公众和合作方造成误导。

Article 14 Labeling of AI-Generated Content and Results

The Group requires that all externally output AI-generated content must include a clear and identifiable AI source label, clearly distinguishing between human-produced content/decisions and AI-produced content/decisions,

ensuring information transparency and not misleading the public or partners.

第十五条 AI 模型偏移与退化校正

本集团针对所有已投入运行的人工智能模型建立全生命周期性能监控机制，定期检测模型输出精度、决策逻辑的偏移与退化问题；同步建立模型迭代校正流程，可及时完成对发生偏移、退化 AI 模型的修正调整，保障 AI 模型持续稳定合规运行。

Article 15 Correction of AI Model Drift and Degradation

The Group establishes a full lifecycle performance monitoring mechanism for all AI models in operation, regularly detecting drift and degradation in model output accuracy and decision logic; simultaneously establishes a model iteration and correction process to promptly complete the adjustment of drifted or degraded AI models, ensuring the continuous stable and compliant operation of AI models.

第十六条 AI 影响评估

本集团定期开展 AI 影响评估工作，主动识别、有效管控潜在运行风险。评估流程覆盖算法公平性专项审查，确保人工智能决策符合公平无歧视的合规与伦理要求。

Article 16 AI Impact Assessment

The Group regularly conducts AI impact assessments to proactively identify and effectively manage potential operational risks. The assessment process covers special reviews on algorithm fairness, ensuring that AI decisions comply with fairness, non-discrimination, and ethical requirements.

第十七条 AI 领域低碳减排

本集团推动 AI 降碳行动，并联动合作供应商共同实施，通过算力调度优化、模型结构轻量化、扩大绿色能源使用比例等路径，降低 AI 数据中心与 AI 模型运行能耗，推动人工智能产业绿色低碳发展。

Article 17: Low-Carbon Emission Reduction in the AI Field

The Group promotes AI carbon reduction initiatives and collaborates with partner suppliers to implement them. By optimizing computing power scheduling, lightweighting model structures, and increasing the proportion of green energy usage, we reduce the energy consumption of AI data centers and AI model operations, promoting the green and low-carbon development of the

AI industry.

第十八条 AI 决策申诉处理机制

本集团建立完善的人工智能决策结果申诉处理机制，面向用户及受 AI 决策影响的第三方开放申诉通道；对相关方提出异议的 AI 决策或结果，由独立审核团队开展人工复核，并出具最终修正结果，保障相关方合法权益。

Article 18 AI Decision Appeal Handling Mechanism

The Group has established a comprehensive appeal handling mechanism for AI decision outcomes, opening appeal channels to users and third parties affected by AI decisions. For AI decisions or results challenged by stakeholders, an independent review team conducts a manual review and issues the final corrected result, safeguarding the legitimate rights and interests of stakeholders.

第十九条 员工 AI 伦理与安全培训

本集团定期为员工提供培训与宣导，帮助其掌握负责任的 AI 应用原则、最佳实践以及不断演进的伦理规范与监管要求。

Article 19 Employee AI Ethics and Safety Training

The Group regularly provides training and guidance to employees, helping them master the principles of responsible AI application, best practices, and evolving ethical norms and regulatory requirements.

第二十条 AI 可持续影响量化

本集团将 AI 项目、AI 工具对可持续发展目标产生的影响纳入量化评估体系，从能耗、碳排放、社会效益等多维度完成量化核算，以此优化 AI 项目设计，推动 AI 使用赋能可持续发展。

Article 20 Quantification of AI Sustainable Impact

The Group incorporates the impact of AI projects and AI tools on sustainable development goals into a quantitative assessment system, performing quantitative calculations from multiple dimensions such as energy consumption, carbon emissions, and social benefits, thereby optimizing AI project design and promoting the use of AI to empower sustainable development.

第五章 附则

Chapter Five. Supplementary Provisions

第二十一条 本政策由数据中心负责解释、修订。

Article 21 This Policy shall be interpreted and revised by the Data Center.

第二十二条 本政策由本集团高级管理层审议批准。本集团高级管理层对本政策的执行、监督及定期检讨承担整体责任，并负责对本政策的修订提供指导。本集团相关职能部门根据职责分工负责本政策的具体落实、解释及日常管理。

Article 22 This Policy has been reviewed and approved by the Group's senior management. The Group's senior management assume overall responsibility for the implementation, supervision, and periodic review of this Policy, and provide guidance on its amendments. The relevant functional departments of the Group are responsible for the specific implementation, interpretation, and daily management of this Policy according to their respective responsibilities.

第二十三条 本政策自发布之日起生效。

Article 23 This Policy shall come into effect from the date of its release.