

《负责任人工智能（AI）政策》

Responsible Artificial Intelligence (AI) Policy

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

1. 目的 Purpose

为规范公司在 AI 技术的研发、采购、部署和应用全生命周期中的行为准则，确保 AI 技术的使用符合伦理规范、法律法规及可持续发展要求，维护利益相关方信任，提升治理水平，特制定本《负责任人工智能政策》（以下简称“本政策”）。本政策构成公司 ESG 治理体系的重要组成部分，与公司信息安全等制度相衔接，共同构成公司科技伦理治理的制度基础。

To standardize the Company's code of conduct throughout the full life cycle of artificial intelligence (AI) technology research and development, procurement, deployment, and application, ensure that the use of AI technology complies with ethical norms, laws and regulations, and sustainable development requirements, maintain stakeholder trust, and elevate governance levels, this "Responsible Artificial Intelligence Policy" (hereinafter referred to as "this Policy") is formulated. This Policy constitutes an important component of the Company's ESG governance system and connects with the Company's information security and other systems, jointly forming the institutional foundation for the Company's governance of science and technology ethics.

制定依据

Basis of Formulation

本政策基于国际公认的 AI 伦理框架、中国现行法律法规以及全球领先企业的负责任 AI 最佳实践制定，主要参考依据如下：

This Policy is formulated based on internationally recognized AI ethical frameworks, current Chinese laws and regulations, and the responsible AI best practices of globally leading enterprises, with the main reference basis as follows:

国际 AI 伦理准则与标准

International AI Ethical Guidelines and Standards

UNESCO《人工智能伦理问题建议书》（2021 年）联合国教科文组织发布的全球首份 AI 伦理国际规范文件。本政策吸收其提出的四大核心价值——人权保护、环境可持续、多样包容、和平共生，以及十大核心原则——比例原则、安全与防护、公平与非歧视、可持续性、隐私权与数据保护、人类监督与决定、透明度与可解

释性、责任与问责、认知与素养、多利益方与适应性治理。

UNESCO "Recommendation on the Ethics of Artificial Intelligence" (2021), the world's first global standard-setting instrument on AI ethics issued by UNESCO. This Policy absorbs its four core values—protection of human rights, environmental sustainability, diversity and inclusion, and peaceful coexistence—and its ten core principles—proportionality, safety and security, fairness and non-discrimination, sustainability, right to privacy and data protection, human oversight and determination, transparency and explainability, responsibility and accountability, awareness and literacy, and multi-stakeholder and adaptive governance.

OECD AI Principles (2019 年发布, 2024 年修订) 经济合作与发展组织制定的 AI 治理国际基准框架。本政策采纳其五项价值观原则包容性增长、可持续发展与福祉; 以人为本的价值观与公平; 透明度与可解释性; 稳健性、安全性与安全性; 问责制。同时参照其五项政策建议——投资 AI 研发、营造包容赋能的数字生态、构建互操作的治理环境、为劳动力转型做准备、推动国际合作。

OECD AI Principles (Released in 2019, updated in 2024), the international benchmark framework for AI governance established by the Organisation for Economic Co-operation and Development. This Policy adopts its five value-based principles: inclusive growth, sustainable development and well-being; human-centered values and fairness; transparency and explainability; robustness, security and safety; and accountability. It also refers to its five policy recommendations: investing in AI research and development, fostering an inclusive and empowering digital ecosystem, shaping an interoperable governance environment, preparing the workforce for the transition, and promoting international cooperation.

EU AI Act (Regulation (EU) 2024/1689, 2024 年) 欧盟发布的全球首部综合性 AI 立法。本政策参照其基于风险的四级分类体系 (不可接受风险、高风险、有限风险、极小风险) 构建公司 AI 风险分级管理制度, 并参考其高风险 AI 系统全生命周期合规义务、通用 AI 模型监管框架及透明度要求。

EU AI Act (Regulation (EU) 2024/1689, 2024), the world's first comprehensive AI

legislation issued by the European Union. This Policy refers to its risk-based four-tier classification system (unacceptable risk, high risk, limited risk, and minimal risk) to build the Company's AI risk classification management system, and references its full life cycle compliance obligations for high-risk AI systems, regulatory framework for general-purpose AI models, and transparency requirements.

中国法律法规与政策

Chinese Laws, Regulations, and Policies

《科技伦理审查办法（试行）》（2023 年）由科技部会同教育部、工业和信息化部等部门发布。本政策遵循其确立的科技活动伦理审查一般性规范，作为公司 AI 伦理审查的制度基础。

"Measures for Ethical Review of Science and Technology (Trial)" (2023), jointly issued by the Ministry of Science and Technology, the Ministry of Education, the Ministry of Industry and Information Technology, and other departments. This Policy follows the general norms for ethical review of scientific and technological activities established therein as the institutional foundation for the Company's AI ethical review.

2. 适用范围 Scope of application

本文件适用于公司及下属全资、控股子公司，以及所有参与个人信息处理的员工、劳务派遣人员、客户、供应商、合作伙伴、承包商、访客等相关主体。使用用途包括但不限于生产运营、商业营销、网站维护等。公司各海外子公司应根据当地法律法规，并参照本政策规定，制定本公司负责任人工智能政策。

This document applies to the Company and its wholly-owned and holding subsidiaries, as well as all relevant subjects involved in the processing of personal information, including employees, dispatched labor personnel, customers, suppliers, partners, contractors, and visitors. Use cases include but are not limited to production and operations, commercial marketing, website maintenance, etc. All overseas subsidiaries of the Company shall formulate their own responsible AI policies in accordance with local laws and regulations and with reference to the provisions of this system.

3. 术语定义与原则 Terms, Definitions and Principles

参照 UNESCO AI 伦理建议书十大核心原则、OECD AI 五项价值观等原则，结合全球行业最佳实践，公司负责任 AI 政策遵循六项核心原则——透明、公平、问责、隐私、安全、包容。六项原则互为支撑、协同实施，贯穿 AI 系统全生命周期。

Referencing the ten core principles of the UNESCO Recommendation on the Ethics of AI, the five value-based principles of OECD AI, and combined with global industry best practices, the Company's responsible AI policy follows six core principles: Transparency, Fairness, Accountability, Privacy, Security, and Inclusion. The six principles are mutually supportive and synergistically implemented throughout the full life cycle of AI systems.

透明：公司承诺对 AI 系统的使用保持透明，在技术可行的范围内提供有意义的可解释信息，使利益相关方能够理解 AI 系统的能力、局限性和决策逻辑。

Transparency: The Company commits to maintaining transparency in the use of AI systems, providing meaningful and explainable information within the scope of technological feasibility, so that stakeholders can understand the capabilities, limitations, and decision-making logic of AI systems.

公平：公司承诺在 AI 系统的全生命周期中尊重人权、公平性和多样性，不强化或传播不公正的偏见。

Fairness: The Company commits to respecting human rights, fairness, and diversity throughout the full life cycle of AI systems, and not reinforcing or disseminating unjust biases.

问责：公司承诺对 AI 系统的全生命周期承担明确责任，建立多层级治理机制，重大 AI 伦理事项须上报董事会战略与可持续发展委员会审议，确保 AI 系统在人类有效监督下运行。

Accountability: The Company commits to assuming clear responsibility for the full life cycle of AI systems, establishing a multi-level governance mechanism, and ensuring that major AI ethical matters are reported to the Strategy and Sustainability Committee of the Board of Directors for review, ensuring that AI systems operate under effective

human oversight.

隐私：公司承诺在 AI 系统的数据采集、处理和使用过程中严格保护个人隐私，遵循数据最小化原则，实施强有力的安全技术保护个人信息。

Privacy: The Company commits to strictly protecting personal privacy during the data collection, processing, and use of AI systems, adhering to the principle of data minimization, and implementing robust security technologies to protect personal information.

安全：公司承诺 AI 系统在整个生命周期内保持稳健、保密和安全，在正常使用、可预见误用或其他不利条件下不会带来不合理的安全风险。

Security: The Company commits to ensuring that AI systems remain robust, confidential, and secure throughout their life cycle, and will not pose unreasonable security risks under normal use, foreseeable misuse, or other adverse conditions.

包容：公司承诺推动 AI 技术的包容性发展，确保 AI 利益惠及所有人群；同时致力于利用 AI 技术促进环境可持续发展，呼应公司可持续发展的使命与价值观。

Inclusion: The Company commits to promoting the inclusive development of AI technology, ensuring that AI benefits accrue to all populations; at the same time, it is committed to utilizing AI technology to promote environmental sustainability, echoing the Company's mission and values of sustainable development.

4. 职责 Responsibilities

4.1 AI 治理架构体系

AI Governance Architecture System

公司建立“决策层—管理层—执行层”三级 AI 治理架构，并与外部合作建立人工智能伦理咨询委员会，与公司现有 ESG 治理架构深度融合，形成覆盖 AI 系统全生命周期的治理闭环。

The Company establishes a three-tier AI governance architecture of "Decision-making Level - Management Level - Execution Level", builds an Artificial Intelligence Ethics Advisory Committee in cooperation with external parties, and deeply integrates this with the Company's existing ESG governance architecture to form a closed governance

loop covering the full life cycle of AI systems.

4.2 决策层

Decision-making Level

董事会下属战略与可持续发展委员会是公司负责任 AI 治理的最高决策机构，履行以下职责：（一）审批负责任 AI 政策及其重大修订；（二）监督 AI 重大伦理与安全事项，听取 AI 研究院关于高风险 AI 项目的专项汇报；（三）将 AI 治理纳入公司 ESG 战略框架，确保 AI 政策与公司可持续发展战略的一致性；（四）审阅 AI 研究院提报的年度 AI 治理报告，评估 AI 伦理风险管理有效性。

The Strategy and Sustainability Committee under the Board of Directors is the highest decision-making body for the company's responsible AI governance, with the following responsibilities: (i) Approving responsible AI policies and their major revisions; (ii) Overseeing major AI ethics and safety matters, and hearing special briefings from the AI Research Institute on high-risk AI projects; (iii) Integrating AI governance into the company's ESG strategy framework, ensuring alignment between AI policies and the company's sustainable development strategy; (iv) Reviewing the annual AI governance report submitted by the AI Research Institute and evaluating the effectiveness of AI ethics risk management.

4.3 管理层

Management Level

设立 AI 研究院，作为公司 AI 治理的管理层协调机构，履行以下职责：（一）制定 AI 伦理操作指南与实施细则，确保本政策的落地执行；（二）审查高风险 AI 项目，审批风险处理方案；（三）指导 AI 影响评估、红队测试和安全审计工作的开展；（四）协调跨部门 AI 伦理事项，确保不同基地 AI 应用的一致性和合规性；（五）定期（至少每年一次）向董事会战略与可持续发展委员会报告 AI 治理进展；（六）跟踪国内外 AI 监管政策动态，评估对公司 AI 实践的影响并建议应对措施。

An Institute of Intelligence is established as the management coordination body for the Company's AI governance, fulfilling the following responsibilities: (I) Formulating AI

ethics operational guidelines and implementation details to ensure the execution of this Policy; (II) Reviewing high-risk AI projects and approving risk mitigation plans; (III) Guiding the implementation of AI impact assessments, red teaming tests, and security audits; (IV) Coordinating cross-departmental AI ethical matters to ensure the consistency and compliance of AI applications across different bases; (V) Regularly (at least annually) reporting AI governance progress to the Strategy and Sustainability Committee of the Board of Directors; (VI) Tracking domestic and international AI regulatory policy dynamics, assessing their impact on the Company's AI practices, and recommending countermeasures.

4.4 执行层

Execution Level

在各生产基地和执行部门层面，设立 AI 治理工作组，由信息技术部负责日常工作协调。执行层职责包括：（一）执行 AI 影响评估，确保每个 AI 项目在上线前完成评估登记；（二）开展 AI 安全测试与偏见检测，组织实施红队测试；（三）负责 AI 资产的登记、版本管理和库存维护；（四）组织 AI 伦理培训，确保覆盖全员和关键岗位人员；（五）监控 AI 系统运行状态，及时发现和报告 AI 系统的异常行为、安全事件或伦理问题；（六）维护 AI 系统文档，确保可追溯性。

At the level of production bases and execution departments, AI Governance Working Groups are established, with the Information Technology Department responsible for daily coordination. Execution level responsibilities include: (I) Executing AI impact assessments to ensure each AI project completes assessment and registration before going online; (II) Conducting AI security tests and bias detection, and organizing red teaming tests; (III) Taking charge of the registration, version management, and inventory maintenance of AI assets; (IV) Organizing AI ethics training to ensure coverage of all employees and key personnel; (V) Monitoring the operational status of AI systems, and promptly discovering and reporting abnormal behaviors, security incidents, or ethical issues of AI systems; (VI) Maintaining AI system documentation to ensure traceability.

4.5 人工智能伦理咨询委员会

Artificial Intelligence Ethics Advisory Committee

委员会吸纳来自学界、政策领域以及产业的外部专家，负责对人工智能伦理问题提供独立的反馈意见和战略指导。

The Committee absorbs external experts from academia, policy fields, and industry, and is responsible for providing independent feedback and strategic guidance on artificial intelligence ethical issues.

5. 管理措施 Management Measures

5.1 AI 影响评估制度

AI Impact Assessment System

任何 AI 系统的开发、采购或重大更新，在项目启动阶段须完成 AI 影响评估。AI 影响评估是 AI 系统上线部署的前置条件。公司 AI 影响评估涵盖透明、公平、问责、隐私、安全、包容六项原则，并参照 EU AI Act 四级分类框架将 AI 系统分为四个风险等级，即不可接受、高风险、有限风险、极小风险。公司依照六项原则建立 AI 安全评估体系：

Any development, procurement, or major update of AI systems must complete an AI impact assessment during the project initiation phase. The AI impact assessment is a prerequisite for the online deployment of an AI system. The Company's AI impact assessment covers the six principles of transparency, fairness, accountability, privacy, security, and inclusion, and references the four-tier classification framework of the EU AI Act to divide AI systems into four risk levels: unacceptable risk, high risk, limited risk, and minimal risk. The Company establishes an AI security assessment system in accordance with the six principles:

5.1.1 常规安全评估

Routine Security Assessment

利用公开安全基准数据集，对 AI 模型进行毒性、偏见、真实性和整体可靠性的量化评估。

Utilizing public security benchmark datasets to conduct quantitative assessments of AI

models regarding toxicity, bias, authenticity, and overall reliability.

5.1.2 红队测试

Red Teaming Tests

组建专门测试团队，通过受控对抗技术模拟安全威胁，主动识别生成式 AI 相关的安全风险（功能错误诱导、生成结果滥用、个人信息泄露、有害内容创建、偏见、危险信息生成等）。

Forming a dedicated testing team to simulate security threats through controlled adversarial techniques, actively identifying security risks related to generative AI (such as functional error induction, generative result abuse, personal information leakage, harmful content creation, bias, dangerous information generation, etc.).

5.1.3 测试频率

Testing Frequency

高风险 AI 系统至少每季度进行一次安全评估；所有 AI 系统在重大版本更新前须通过安全测试。

High-risk AI systems shall undergo security assessments at least quarterly; all AI systems must pass security testing prior to major version updates.

5.1.4 独立审查

Independent Review

高风险 AI 系统的安全评估须由独立于开发团队的内部或外部专家进行审查。

The security assessment of high-risk AI systems must be reviewed by internal or external experts independent of the development team.

5.2 AI 伦理培训

AI Ethics Training

5.2.1 全员基础培训

Basic Training for All Employees

将 AI 伦理纳入公司全员必修培训体系，覆盖研发、生产、供应链、营销全岗位。

Incorporating AI ethics into the Company's mandatory training system for all employees, covering all positions in research and development, production, supply

chain, and marketing.

5.2.2 专项深度培训

Specialized In-depth Training

面向 AI 研发工程师、数据分析师、产品经理等关键岗位，开设 AI 伦理专项课程，涵盖偏见检测、安全设计、隐私保护等专业内容。

Targeting key positions such as AI R&D engineers, data analysts, and product managers, special AI ethics courses are provided, covering professional content such as bias detection, secure design, and privacy protection.

5.3 负责任人工智能社会参与

Responsible AI Social Participation

参与行业平台，推动行业 AI 倡议落地推广；

Participating in industry platforms to promote the implementation and widespread adoption of industry AI initiatives;

加入 AI 伦理协会，与行业标准对齐；

Joining AI ethics associations to align with industry standards;

深化与国内外高校的产学研 AI 合作，将伦理要求嵌入合作项目；

Deepening AI industry-academia-research collaborations with domestic and international universities, embedding ethical requirements into cooperative projects;

关注并积极回应国内外 AI 监管要求，跟踪政策动态。

Following and proactively responding to domestic and international AI regulatory requirements, and tracking policy dynamics.

6. 附则 Supplementary Provisions

6.1 政策管理与更新

Policy Management and Updates

本政策经董事会授权制定，由董事会战略与可持续发展委员会审阅并批准通过，并由 AI 研究院负责日常管理和解释。倘若本政策因公司需求和 ESG 发展趋势而需作出必要的更改，有关更改将提交至公司董事会战略与可持续发展委员会，以供其审阅，并应至少每三年一次呈予董事会战略与可持续发展委员会，以供其批核。

This Policy is formulated with the authorization of the Board of Directors, reviewed and approved by the Strategy and Sustainability Committee of the Board of Directors. The AI Research Institute shall be responsible for its day-to-day administration and interpretation. Should any necessary amendments to this Policy be required in response to corporate needs and ESG development trends, such amendments shall be submitted to the Strategy and Sustainability Committee of the Board of Directors for review. In addition, the Policy shall be presented to the aforesaid Committee for approval at least once every three years.

本政策将根据技术发展、法律法规变化和国际标准更新而动态调整，至少每年审查一次，或遇重大监管变化时即时审查。

This Policy will be dynamically adjusted in accordance with technological developments, changes in laws and regulations, and updates in international standards. It shall be reviewed at least once a year, or reviewed immediately upon major regulatory changes.

发现违规行为，AI 伦理委员会应立即启动调查，并在合理期限内完成调查报告和处理建议，提交董事会战略与可持续发展委员会审阅。

Upon discovering non-compliant behaviors, the AI Ethics Committee shall immediately launch an investigation, complete an investigation report and handling recommendations within a reasonable timeframe, and submit them to the Strategy and Sustainability Committee of the Board of Directors for review.

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

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