鹏鼎控股
AVARY HOLDING

Artificial Intelligence Governance Policy

The rapid advancement of artificial intelligence (AI) technology is bringing both new opportunities and new risks to industries worldwide. Avary Holding (Shenzhen) Limited and its subsidiaries (hereinafter referred as the "Group") firmly believe that the responsible development and use of AI technology can create value for our customers, employees, shareholders, and society. The Group has therefore established this Artificial Intelligence Governance Policy (hereinafter referred as the "Policy") to set forth the ethical principles and governance standards to be observed throughout the development, deployment, and use of AI technology, ensuring that such applications comply with laws and regulations, safeguard fundamental human rights, maintain information security and personal privacy, guard against unfairness and bias, and give due regard to environmental sustainability.

This Policy applies to all subsidiaries, joint ventures, and employees of the Group (including full-time employees and contract personnel), and requires the Group's suppliers, outsourcing providers, contractors, and other business partners to comply with it as well:

1. Governance Structure and Accountability

The Group is committed to establishing a sound AI governance structure that clearly delineates the roles and responsibilities of each level, including management, and to putting in place mechanisms for grievances and responses. Where stakeholders consider that the operation of an AI system has produced unfair, improper, or erroneous outcomes, they may raise the matter through the grievance channels established by the Group. A designated unit will investigate

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and handle the matter and respond with the outcome within a reasonable period. The identity of the complainant shall be kept confidential, and retaliation of any kind is prohibited.

2. Privacy Protection and Information Security

Throughout the collection, processing, storage, transmission, and use of data in AI systems, the Group shall comply with the privacy protection laws and regulations of its home jurisdiction and of each jurisdiction in which it operates, and shall adhere to the principle of privacy by design. The Group shall adopt technical and organizational measures such as data minimization, de-identification, encryption, and access control, and shall establish information security detection and defense mechanisms for AI models and data processing, so as to reduce privacy and information security risks.

3. Human Oversight and Decision-Making Responsibility

For critical or high-risk decisions that affect the rights of stakeholders, the Group shall reserve the authority for personnel to intervene, review, override, or suspend the operation of AI at any time. The Group shall clearly assign management responsibility for AI systems and establish monitoring and risk assessment mechanisms, so as to ensure that AI decision-making is controllable, traceable, and accountable.

4. System Transparency and Explainability

The Group shall implement transparency and explainability in its AI systems. When users interact with an AI system, the Group shall provide clear notice enabling them to recognize that they are interacting with an AI system, and shall provide users with sufficient information to help them understand the results or recommendations produced by the AI.

5. Boundaries of Application and Compliance Baseline

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The Group shall clearly define the scope of application of its AI systems and strictly prohibit any use that is unapproved or exceeds authorized scope. The Group also strictly prohibits the development or use of AI applications that infringe human rights, including those involving manipulation, social scoring, or unauthorized biometric surveillance.

6. Low-Carbon Energy and Ecological Footprint

In the design and application of AI technology, the Group shall give full consideration to energy efficiency and to the long-term social, economic, and environmental impacts. The Group shall give priority to energy-efficient architectures, improve resource-use efficiency, and reduce the carbon emissions and water consumption associated with AI computing.

7. Continuous Review

This Policy shall be reviewed and updated periodically in accordance with international standards, laws and regulations, and developments in AI technology, so as to maintain its applicability and effectiveness.

8. Implementation and Amendment

This Policy shall take effect after being submitted to and signed by the Chairman on September 7, 2026, and the same procedure shall apply to any amendment.

Chairman : 沈慶芳

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